

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Broadcast Localism) MB Docket No. 04-233
)

To: The Office of the Secretary
Attention: The Commission
ELECTRONIC FILING

COMMENTS OF SAGA COMMUNICATIONS, INC.,
ON REPORT ON BROADCAST LOCALISM
AND NOTICE OF PROPOSED RULEMAKING

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Saga Communications, Inc. (“Saga”)¹, by its attorneys, and pursuant to Section 1.415 of the Commission’s Rules, hereby files its Comments on the notice of proposed rule making contained within the *Report on Broadcast Localism and Notice of Proposed Rulemaking*, FCC 07-218, released January 24, 2008 [73 Fed. Reg. 8255, published February 13, 2008] (“NPRM”).²

Summary of Filing

The Commission should not adopt rules as proposed in the NPRM (with the possible exception of the proposal to create some new Class A television stations.) The proposed rules that would mandate the creation of Community Advisory Boards and the

¹ Saga Communications, Inc., is a broadcasting company whose business is devoted to acquiring, developing and operating broadcast properties. Directly and through subsidiaries, Saga owns or operates broadcast properties in 26 markets, including 61 FM and 30 AM radio stations, state radio networks, farm radio networks, television stations and low-power television stations.

² Time for filing Comments was extended to April 28, 2008, by *Public Notice*, DA 08-515, released March 3, 2008, so these Comments are timely filed.

keeping and filing of detailed quarterly reports summarizing a licensee's past programming directed to community issues will not have any positive effect. Saga believes that most stations, and all the stations owned by Saga, meet or exceed their obligations to their communities without the need for additional regulation. Requiring stations to be staffed whenever they are on the air will most likely result in a reduction of service due to economic constraints. Requiring the main studio to be located in the licensee's community of license will not encourage localism. Other proposals to regulate music playlists and "voice-tracking" violate the First Amendment and Section 326 of the Communications Act.³ Saga urges the Commission to reject this unwarranted and unwise course and not adopt any rules that would modify the current rules.

Preliminary Statement

The NPRM states that the proposed rules are designed to "enhance broadcast localism and diversity, to increase and improve the amount and nature of broadcast programming that is targeted to the local needs and interests of a licensee's community of service, and provide more accessible information to the public about broadcasters' efforts to air such programming." Saga shows herein that new rules are unnecessary to accomplish the Commission's goals. In fact, contrary to achieving their intended goals, these rules could actually decrease service to licensees' communities; supplant the broadcaster's right and responsibilities with the unregulated wishes and whims of ill-defined "community leaders", with their own agendas, who are not legally constrained as is the broadcaster; and further encumber the licensee's limited resources by requiring

³ Title 47 U. S. C. § 326 (The Communications of Act of 1934, as amended is cited herein as the "Communications Act").

compliance to yet more government mandated, time-consuming and counter-productive record-keeping and reporting obligations.

In previous decades, broadcasters were required by Commission rules to “ascertain” community issues and broadcast programs to address those issues. The general requirement was codified in 1971 (and refined in 1976) with the adoption of the “Renewal Primer” referred to in the NPRM.⁴ The Commission decreed that every community had specified elements⁵ that had to be surveyed prior to filing a “long-form” application. Failure to contact just one of these “leaders” could result in the Commission’s taking adverse action against a licensee.⁶

As the NPRM acknowledges “In the 1980s, the Commission eliminated these requirements, first for radio (in 1981), and then for television (in 1984), concluding that market forces, in conjunction with the imposition of an issue-responsive programming documentation obligation and the petition to deny process, could be relied upon to ensure that broadcasters aired programming responsive to the needs and interests of their communities.”⁷ It appears that the author or authors of the NPRM have forgotten the lessons learned in the 1980s. In addition, these proposed rules indicate a failure to appreciate what it is to operate a broadcast station in 2008, or even what audiences want the stations to provide. The Commission should understand that members of the radio

⁴ See generally, *Primer on Ascertainment of Community Problems by Broadcast Applicants*, Report and Order, 27 F.C.C. 2d 650 (1971); *Ascertainment of Community Problems by Broadcast Applicants*, First Report and Order, 57 F.C.C. 2d 418, 442 (1976) (“*Renewal Primer*”).

⁵ The list of elements include leaders of: agriculture, business, charities, civic, neighborhood and fraternal organizations, consumer services, culture, education, environment, government (local, county, state and federal), labor, military, minority and ethnic groups, organizations of and for the elderly, organizations of and for women, organizations of and for youth and students, professions, public safety, health and welfare, recreation and religion (44 FCC 2302, 20 RR 1901 (1960)).

⁶ *Frank M. Cowles*, 37 FCC 2d 411 (ALJ, released December 15, 1971).

⁷ Citing *Deregulation of Radio*, Report and Order, 84 FCC 2d 968, 997-98 (1981).

audience listen to stations, generally, for one of three reasons: (1) to be entertained by their favorite personalities such as a morning comedy team; (2) to enjoy their favorite music, whether it be rock, classical, country or another of the ever-expanding music genres; and (3) to be informed by news, talk, sports and the like. Listeners change stations constantly, leaving a station as soon as it presents something unappealing. Over time, Saga has learned that listeners to music radio do not want their programs interrupted by talk, commercial announcements and news broadcasts, so Saga carefully designs this product to limit the intrusion. In almost all cases, Saga runs news updates in its most important time portion of morning “drive” time (when motorists are most likely to be listening). Saga also views community involvement as an integral part of its programming through local events and short form interviews. Local programming is an important part of Saga’s program architecture, but long-form issue related shows tend not to draw sufficient audience to justify their presentation during certain periods.⁸ Most stations that present a music format broadcast their required long-form public affairs programs on weekend mornings in less popular time periods. They have learned that these programs are not congruent with the expectations of music listeners. Unfortunately, the only result of the proposed rules will be to cause listeners to tune out the unwanted talk of local affairs and defect to competing stations that are not, at that moment, broadcasting long-form public service programs.

As a company that operates more than 90 commercial radio stations in large, medium and small markets,⁹ and in order to remain at the top of those markets, Saga

⁸ See Attachment 1, Statement of Steven J. Goldstein, Executive Vice President of Saga Communications, Inc., who is in overall charge of the programming of Saga’s stations. Mr. Goldstein has 30 years experience in radio programming.

keeps its finger on the pulse of its communities.¹⁰ The radio business has evolved over time and stations have become much more narrow and specialized in their programming. This evolution has occurred because of the proliferation of competing radio voices, requiring stations to narrowly tailor their presentations in order to be competitive. For example, in the Milwaukee, Wisconsin, radio market, where Saga operates five commercial stations, there are 42 other stations,¹¹ including noncommercial stations that compete with commercial stations for listeners. In the Columbus, Ohio, radio market, where Saga operates four commercial stations, there are 46 other stations.¹² In addition to commercial stations broadcasting news and talk, listeners find news and public affairs programs on noncommercial stations carrying NPR and similar public interest programs. This multitude of choices, available to today's radio listener, did not exist when the Communications Act was enacted in 1934 or when the *Renewal Primer* was adopted in 1971.¹³ The Broadcasting business is not only much more diverse but also very much more competitive. These facts support actions of the Commission that recognize that market forces – probably all on their own – ensure that broadcasters address the

⁹ Saga or its subsidiaries operate radio stations in, *inter alia*, the radio markets including: Milwaukee, WI; Columbus OH, Norfolk, VA; Des Moines, IA; Charlottesville, VA; Asheville, North Carolina; Springfield, IL, Champaign, IL; Springfield, MA; Manchester, NH; Bellingham, WA; Greenfield, MA; Keene, NH; as Yankton, SD ; Mitchell, SD and Spencer, IA.

¹⁰ *Infra*, beginning at page 14, Saga submits statements from leaders in some of its communities attesting to Saga's commitment to broadcasting programs that address the needs and interests of its communities of license.

¹¹ Source, BIA Market Definition for Milwaukee-Racine.

¹² Source, BIA Market Definition for Columbus.

¹³ By News Release dated March 18, 2008, the Commission gave the total number of radio stations including FM Translators and LPFM stations at **29,712** (13,977 AM, FM and FM Educational, 5904 FM Translators and Boosters and 831 LPFM); while as of September 30, 1990 (the earliest record kept on its website by the Commission), there were only **12,617** (10,770 AM, FM and FM Educational and 1,847 FM Translators and Boosters). Source: <http://www.fcc.gov/mb/audio/totals/bt900930.html>. On information and belief, the number was far fewer in 1971.

“localism” needs of the communities they serve. In *Deregulation of Radio, supra*, the Commission recognized that it did not need to regulate the way broadcasters addressed localism issues other than requiring the keeping of records about the station’s treatment of local issues. The current state of affairs even more strongly militates against adopting rules that mirror those that the Commission wisely abandoned twenty-six years ago. Furthermore, the Commission should not adopt new rules as proposed because broadcasters are meeting or exceeding their obligations in this area already without the need for additional regulation.

Specific Comments on NPRM

In August 2003, the Commission launched its “Localism in Broadcasting” initiative to review localism practices among broadcasters and on July 1, 2004, the Commission issued a Notice of Inquiry¹⁴ (“*NOI*”) concerning localism. Through the *NOI*, the Commission sought direct input from the public on how broadcasters are serving the interests and needs of their communities; whether the agency needs to adopt new policies, practices, or rules designed directly to promote localism in broadcast television and radio; and, if so, what those policies, practices, or rules should be. The *NOI* observed that the concept of localism has been a cornerstone of broadcast regulation for decades, a principle with which Saga agrees and supports. The Commission sought input on a number of issues related to broadcast localism.¹⁵ A key question to be resolved

¹⁴ *Broadcast Localism*, Notice of Inquiry, 19 FCC Rcd 12425 ¶ 1 (2004).

¹⁵ Among them were questions as to how broadcasters are communicating with the communities that they serve and are serving the needs of those communities, including whether stations are airing a sufficient amount of community-responsive programming, such as news, political material and disaster warnings, as well as the state of their service to traditionally underserved audiences. It also sought comment on the relationship between networks and their affiliated stations, payola and sponsorship identification, the license renewal process and possible additional spectrum allocations.

is whether the Commission should impose new burdens on broadcasters, *inter alia*, by creating community advisory boards or, in the alternative, continue to rely on market forces and the existing issue-responsive programming rules to encourage broadcasters to meet their obligations.¹⁶ Saga demonstrates herein that, without question, the Commission should continue to rely on market forces which have been highly effective in ensuring that broadcasters meet their obligations to their local communities.¹⁷

There were nine general localism areas of inquiry specified in the *NOI*: (1) communication between licensees and their stations' communities; (2) nature and amount of community-responsive programming; (3) political programming; (4) underserved audiences; (5) disaster warnings; (6) network affiliation rules; (7) payola/sponsorship identification; (8) license renewal procedures; and (9) additional spectrum allocations. In its NPRM, the Commission called for additional comment from the public on its proposals.

Legal Deficiencies. This docket will not be ripe for a decision until the Commission issues a supplement to the NPRM providing for comment a draft of the rules it proposes to impose on licensees. Perhaps it can do this after it gathers the initial

¹⁶ *NOI* at 12427-28 ¶ 7.

¹⁷ The NPRM reports that as of December 2007, the Commission has received over 83,000 written submissions from various parties including broadcasters, broadcast industry organizations, public interest groups, and members of the public. The NPRM notes that the Commission has held six field hearings: in Charlotte, North Carolina (October 22, 2003); San Antonio, Texas (January 28, 2004); Rapid City, South Dakota (May 26, 2004); Monterey, California (July 21, 2004), Portland, Maine (June 28, 2007), and Washington, D.C. (October 31, 2007). A review of the materials and transcripts reveal that many of the participants are representative of groups who have agendas that, while well-intentioned, if implemented, could destroy commercial broadcasting as a viable business model; and will, at a minimum, result in a diminution of service by many broadcasters based on financial realities. It seems that some of the FCC staff accepted at face value the arguments served up by the activist witnesses who appeared before them and gave little more than lip service to the contrary evidence showing that broadcasters are meeting and exceeding the requirements.

comments in this docket. It is clear that the Administrative Procedure Act¹⁸ demands that adequate public notice be given before a federal agency takes action in adopting a new rule. Typically, to meet this burden, the Commission attaches an appendix to its notices of proposed rule making providing a draft of the proposed rules since the exact wording of those rules will directly impact the regulatees. In this case, no such draft of rules was attached to the NPRM, thus making it impossible for the public, including Commission licensees, to comment on the text of the proposed rules to which they will be held accountable. Thus, unless draft rules are adopted and released to the public for substantive comment, any rule adopted in this docket will be a legal nullity and the courts would most likely support this contention.¹⁹

Putting aside, for the moment, the legal infirmity of this proceeding, most of the notions advanced in the NPRM are either impractical, unworkable, or would result in unintended negative consequences. The Commission should conclude this docket by not modifying the rules as related to radio. The only portion of the NPRM that merits positive action is the proposal to permit qualifying low power television stations to apply for Class A status. That is discussed *infra*.

¹⁸ Title 5 USC § 553(b). Section 553(b) applies to this NPRM and requires that general notice of proposed rule making shall be published in the Federal Register and that the notice shall include— (1) a statement of the time, place, and nature of public rule making proceedings; (2) reference to the legal authority under which the rule is proposed; and (3) **either the terms or substance of the proposed rule or a description of the subjects and issues involved.** (Emphasis added.)

¹⁹ See *Akron, Canton and Youngstown Railroad Co. v. ICC*, 370 F. Supp. 1231 (U. S. District Court – Maryland, 1974). (The proceedings did not give the plaintiffs and other interested parties the required opportunity after notice to present facts for consideration by the ICC prior to the final substantive agency decision.)

COMMUNICATION BETWEEN LICENSEES AND THEIR STATIONS' COMMUNITIES

Renewal Application Pre- and Post-Filing Announcements. The Commission states its belief that it should change the existing rules governing the so-called “pre-filing and post-filing announcements” that licensees must air in connection with their renewal applications. In addition to the existing requirement for on-air announcements about soon-to-be-filed and pending license renewal applications, the NPRM seeks comments on whether to require that the same information be posted on a licensee’s website and whether the Commission should broaden the required language for the announcements. The NPRM also seeks comment on whether a licensee’s on-line provision of the Commission’s web address could be linked directly to these areas on the FCC’s website. Saga believes the current method of informing the public when licensees are undergoing the license renewal process is adequate and does not require any modification. Saga is unaware of any evidence that parties seeking to protest a license renewal application were deprived of this right because they did not know the process was ongoing. Essentially, the Commission seeks to fix something that is not in any way broken. Moreover, it is inequitable to licensees who maintain internet websites to take this proposed action when licensees without sites are exempt.²⁰

There is the issue of whether members of the public regularly review local public inspection files. Saga’s experience is that most requests to view the public file occur during election periods. Occasionally a local candidate will come in to view the political

²⁰ The Commission already requires licensees who have websites to post their equal employment opportunity public file reports thereon. This requirement should not create a precedent for the Commission’s proposal regarding public notice of renewal applications.

file to see what the competitor is spending.²¹ Rarely, if ever, do members of the public visit the public file. Despite the Commission's belief that this is due to lack of knowledge on the part of the public, it is more probably the result of listener satisfaction with the mission of the stations to which they listen. Broadcasters must publish the existence of the public file in the newspaper and invite the public to review it. At renewal time, they must broadcast information about their pending renewal applications. There is absolutely no convincing evidence that any change is necessary in this area.

Community Advisory Boards. The NPRM tentatively concluded that each licensee should convene a permanent advisory board made up of officials and other leaders from the service area of its broadcast station, based on the belief that these boards will promote both localism and diversity. Saga suggests this is a spectacularly bad idea which will not promote localism and diversity any more than the Commission's now-abandoned ascertainment process promoted localism and diversity. As noted in the NPRM, more than twenty years ago the Commission abandoned its ascertainment requirement that directed broadcasters to comply with detailed, formal procedures to determine the needs and interests of their communities, at the time that they initially sought their station authorizations, asked for approval to obtain a station, and sought license renewal. The Commission now wants to return to this outmoded and bureaucratic methodology, claiming that "the record before us here shows that new efforts are needed to ensure that licensees regularly gather information from community representatives to help inform the stations' programming decisions..." Thankfully, the Commission observes, at NPRM ¶16, that the potential benefits of formal ascertainment do not justify

²¹ See Attachment 2, Statement of David Paulus, Vice President and General Manager of Tidewater Communications, LLC, licensee of three stations in the Norfolk, Virginia, radio market.

the costs, but notes its tentative conclusion that “the same fundamental objectives can be achieved through other means, including regular, quarterly licensee meetings with a board of community advisors and improved access by the public to station decision makers.”

The proposal is the exact same procedure as formal “ascertainment” only writ another way and fraught with more potential problems. If adopted, it will be abandoned in the future; just as the previous ascertainment methods were abolished. The major difference in 21st century ascertainment and the abandoned procedures is that the community leaders would come to the station or meet at some neutral hall rather than have station management interview the leaders in their places of work. The result will be the same as before: High costs for broadcasters, problems with developing a fair way to choose the advisors and the risk of unwarranted intrusion into the licensee’s responsibility to program its station in the manner the licensee determines is best. The FCC’s recently revised *Public and Broadcasting* publication sets out the dilemma that would be faced by broadcasters who rejected suggestions from the Community Advisory Board. “The First Amendment, as well as Section 326 of the Communications Act, prohibits the Commission from censoring broadcast material and from interfering with freedom of expression in broadcasting.”²² Moreover, “Licensees are responsible for selecting their entertainment programming, as well as programs concerning local issues, news, public affairs, religion, sports events, and other subjects.”²³ “In light of their discretion to formulate their programming, station licensees are not required to broadcast

²² *The Public and Broadcasting*, Revised April 2008, at page 11.

²³ *Ibid*, page 11.

everything that is offered or otherwise suggested to them.”²⁴ On the one hand, broadcasters have great discretion to broadcast what they judge to be in the public interest, but, on the other hand, if the new rules are adopted, broadcasters will run the risk of offending the community advisors (and setting themselves up for unwarranted trouble at renewal time) if they reject some suggestion made in the course of ascertainment. A federally-mandated community advisory board making program decisions would clearly violate Section 326 of the Communications Act. While some licensees have reported the benefits of community advisory boards in ascertaining matters of local interest, these were voluntary methods created by the licensees to assist the licensees, not quasi-official organizations required by the government.²⁵ A licensee engaging in such voluntary methods can deviate from its plan based on its judgment so long as the licensee develops a list of issues to which it can respond with programs. But, once the heavy hand of government imposes the proposed requirements, broadcasters will be forced to comply exactly with the rubrics which will take on the aspects of holy writ. At renewal time, broadcasters will be bracing for “gotcha” petitions from some unscrupulous activist groups looking for a payoff. If the past is any guide, would-be petitioners can be expected to send their minions far and wide to scrutinize public files and internet postings, to record station programming and then compare the data gleaned with what the licensee submits with its renewal application. They will flyspeck that application and

²⁴ *Ibid*, page 11.

²⁵ Quare: Would Community Advisory Board meetings be subject to state “Sunshine” laws? See, for example, Florida Statute 286.011 which provides in part “All meetings of any board or commission of any state agency or authority or of any agency or authority of any county, municipal corporation, or political subdivision, except as otherwise provided in the Constitution, at which official acts are to be taken are declared to be public meetings open to the public at all times, and no resolution, rule, or formal action shall be considered binding except as taken or made at such meeting. The board or commission must provide reasonable notice of all such meetings.” Counsel has been informed that this law applies even to meetings of homeowners’ associations boards of directors.

seize on any discrepancy, no matter how innocent, crying “misrepresentation” since the applications will no doubt be backed up by a certification that the information in the application is pristine. This will give birth to a behemoth of unwarranted trouble for both broadcasters desperately fighting for the right to stay in business and for the overworked Commission staff that will have to deal with frivolous objections.

NATURE AND AMOUNT OF COMMUNITY-RESPONSIVE PROGRAMMING

Community advisory boards are not necessary for a broadcaster to respond to issues that are important to its community of license. Broadcasters already have in place methods that work for them that allow them to ascertain the issues in their communities. The attached statement of Cary Pahigian²⁶ shows that the Saga’s Portland stations regularly work with a variety of local organizations to address the needs of southern Maine.²⁷

Mr. Pahigian also reports that in addition to promoting fundraisers and raising awareness for the organizations listed in footnote 27 the Saga Portland stations broadcast a weekly community service program called *Maine Points*. This is a 30-minute program geared to address community issues in a long form-program. The program is broadcast on each of Saga’s stations serving the Portland market. Moreover, WGAN(AM), a highly-rated radio station in the Portland market, which operates with a news-talk format,

²⁶ Attachment 3, Statement of Cary Pahigian, Vice President of Saga Communications of New England, LLC, licensee of radio stations in the Portland, Maine, radio market.

²⁷ In the past year these organizations have included: Preble Street Resource Center; Portland Public Library; Portland Chamber of Commerce; Maine Army National Guard; American Heart Association; American Red Cross; Make A Wish Foundation of Maine; Ronald McDonald House; Cancer Community Center; Maine Children’s Cancer Program; Homeless Animal Rescue Team; Portland's Regional Opportunity Program; Camp Sunshine; Maine Credit Union League; Greater Portland Big Brothers Big Sisters; Maine Share; Maine Cancer Foundation; Cancer Connections Conference; City of Portland; and Portland Music Foundation

airs a regular local talk show Monday-Friday 5:30am-9am and Saturday/Sunday 6am-10am. Many of the issues discussed are local with opinions voiced by local callers. The issue-responsive program “fits” the WGAN news-talk format. Norfolk, Virginia cluster manager David Paulus states that Saga’s Norfolk stations, are heavily involved in local matters, broadcast material responsive to those matters, and that there is no reason to impose formal ascertainment reporting obligations on stations.

Supporting Letters from Community Leaders. Submitted herewith are copies of letters from public officials and other leaders who support the efforts Saga’s stations make in their respective markets to provide local programming and support local organizations.

Manchester, New Hampshire

A Saga subsidiary operates three stations in the Manchester, New Hampshire, radio market under the local umbrella, “Manchester Radio Group.” Attached hereto²⁸ are copies of letters (and an email) from the Mayor of Manchester, Public Service of New Hampshire (utilities), “Try It & Buy It” Expo, Manchester affiliate of the American Heart Association/American Stroke Association, Currier Museum of Art, New Hampshire Food Bank, New Horizons Soup Kitchen, McDonough Elementary School, Henry Wilson School Community Center, and Brookside Congregational Church.

²⁸ Attachment 4, copies of Manchester letters from leaders.

Greenfield, Massachusetts

A Saga subsidiary operates two stations (WPVQ and WHAI) in the Greenfield, Massachusetts, radio market. Attached hereto²⁹ are letters from the mayor of Greenfield, Baystate Franklin Medical Center, Chief of the Greenfield Police Department, Chief of the Montague Police Department, Greenfield Department of Public Works, Greenfield Fire Department, Turners Falls Fire Department and the Greenfield Lions Club.

Bucyrus, Ohio

A Saga subsidiary operates two stations (WBCO and WQEL) in the Bucyrus, Ohio, radio market. Attached hereto³⁰ are letters from the NOAH Project of Crestline, Ohio (which dedicates its efforts in the development of a totally accessible housing community for persons 55 years and older), Crawford County American Red Cross, Bucyrus Area Safety Council, President and Vice President of the Crawford County Commissioners, President and Vice President of Galion City Council, Galion City School District, Bucyrus Community Hospital, City Manager of Galion, Ohio, Superintendent of the Wynford Board of Education, and the Chief of the Bucyrus Police Department.

Asheville, North Carolina

A Saga subsidiary operates four stations in the Asheville, North Carolina, radio market under the trade name "Asheville Radio Group." Attached hereto³¹ are letters from the Executive Director of the Buncombe County Schools Foundation, the Corporate

²⁹ Attachment 5, copies of Greenfield letters from leaders.

³⁰ Attachment 6, copies of Bucyrus letters from leaders.

³¹ Attachment 7, copies of Asheville letters from leaders.

Dietician of Ingles Supermarkets (praising the WOXL-FM morning team for their commitment to the community), Executive Director of OnTrack Financial Education and Counseling (non-profit, community-based agency with programs funded by the United Way of Asheville and Buncombe County),³² Care Partners Hospice Foundation, Asheville Humane Society, and MarketImpact, Inc. (mentioning Saga's role in developing a children's park.)

Des Moines, Iowa

A Saga subsidiary operates six stations in the Des Moines, Iowa, radio market under the trade name "Des Moines Radio Group." Attached hereto³³ are letters from ABATE of Iowa (road safety organization), Altoona Campus, University Iowa Children's Hospital, Muscular Dystrophy Association, Children's Miracle Network, Iowa Department of Elder Affairs, Glen Oaks Country Club Women's Charity Gala Committee, Kiwanis Club of Des Moines, and United Way of Central Iowa. Moreover, one of Saga's Des Moines stations, KSTZ(FM), was one of 10 radio stations nationwide awarded the National Association of Broadcasters 2008 Crystal Radio Award recognizing the station's exemplary commitment to community service.

More similar letters could be submitted, but Saga is reluctant to burden the record beyond the approximate 107,000 filings in the docket as of April 25, 2008. It should be clear that Saga is doing its part in promoting localism without the additional rules

³² The writer says, "To hear that additional rules and added administrative burdens are even being considered is disheartening to me. What needs to happen is for incentives to be in place to reward stations like ARG and make it easier for them to invest in the community, not more time consuming and expensive."

³³ Attachment 8, copies of Des Moines letters from leaders.

proposed, and Saga is not the only licensee that successfully engages in these efforts without the imposition of draconian new rules.

This programming is being provided to address ascertained issues using the licensee's own judgment, instead of the government's. The process of selecting or electing boards presents serious problems in not offending persons not chosen. The former ascertainment guidelines should not be a starting point to identify segments in the community with whom the licensees should consult since there is no reason to believe that the process that did not work in 1971 and was abandoned for radio in 1981³⁴ will work better (or at all) in 2008. It would be an impossible task to compose these boards so as to ensure that all segments of the community, including minority or underserved members of the community, are included. Would there have to be 19 or 20, or more members of the board? What if the licensee couldn't get someone from a critical element of the community to participate? Many people have busy lives and responsibilities to their families. Perhaps only retired and unemployed persons would feel they had time to participate in what is essentially a favor to the broadcaster. The makeup of the board could skew any data collected and make it highly unreliable. **In sum, licensees should not be required to create or meet with advisory boards.**

The Commission should also not adopt any "additional, informal efforts to gather information from members of their communities." Further, and obviously, the

³⁴ *Deregulation of Radio*, Report and Order, 84 F.C.C.2d 968 (1981).

Commission should not saddle radio broadcasters with the completion and filing of an additional standardized disclosure form³⁵ as was recently adopted for television licensees.

Remote Station Operation. The NPRM discusses the Commission's concern that automated broadcast operations, which allow the operation of stations without a local presence, may have a "perceived" negative impact that such remote operation may have on licensees' ability to determine and serve local needs. This is plainly an incorrect finding. In 1995, the Commission authorized unattended technical operation of broadcast stations and expanded the ability of stations to control and monitor station technical operations from remote locations. The NPRM recognizes that licensees "have broadly embraced this new technical flexibility, and many stations now operate for extended periods without station personnel present at or near transmission facilities." The NPRM mentions the *Digital Audio FNPRM* at 10391 ¶ 119, wherein the Commission asked (rather slyly) whether it should review its rules and determinations that facilitated the development of the automated radio broadcast operations. It also asked whether changes in remote radio operation should affect existing rules. In a footnote, the NPRM notes "we do not seek comment on this issue here; these issues will be resolved in the Digital Audio Broadcasting docket (MM Docket No. 99-325)." However, whether sought or not, Saga is commenting here and in MM Docket No. 99-325, since the Commission has referenced the issue in this docket and adequate notice was not given in MM Docket No. 99-325 that the rules applicable to digital broadcasting could impact analog broadcasting in this manner. The Commission is "considering requiring that licensees maintain a physical presence at each radio broadcasting facility during all hours of operation."

³⁵ FCC Form 355.

Without any regard for the unintended consequences of such a rule, the Commission says, “Requiring that all radio stations be attended can only increase the ability of the station to provide information of a local nature to the community of license. This is an insupportable fallacy and based on the same kind of wishful reasoning as was found to be arbitrary and capricious in the court’s abolition of the former comparative hearing procedures that were followed with Talmudic zeal for many years.”³⁶

The direct result of such a misguided rule would not expand radio service during times of emergencies, but would have the exact opposite effect. The NPRM ignores the provisions of Section 73.1740 of the Rules (not teed up for modification in this proceeding) which, in practical effect, permits commercial radio stations to sign off at 10 p.m. and resume operations at 8 a.m. and remain off all day on Sundays.³⁷

Noncommercial educational stations and television stations have an even less rigorous requirement for operational minimum hours. The direct result of the Commission’s proposal is that many radio stations, especially in smaller and medium sized markets would terminate overnight operations rather than pay an employee to “babysit” during

³⁶ The United States Court of Appeals for the District of Columbia Circuit issued a decision regarding the Commission's comparative process in *Bechtel v. FCC*, 10 F.3d 875 (D.C. Cir. 1993). The court ruled that the integration of ownership into management, one of the principal criteria used in evaluating applicants for new broadcast facilities, is arbitrary and capricious and therefore unlawful.

³⁷ Title 47 CFR § 73.1740 Minimum operating schedule, provides in pertinent part:

- (a) All commercial broadcast stations are required to operate not less than the following minimum hours:
(1) AM and FM stations. **Two-thirds of the total hours they are authorized to operate between 6 a.m. and 6 p.m. local time and two-thirds of the total hours they are authorized to operate between 6 p.m. and midnight, local time, each day of the week except Sunday** (emphasis added).

- (b) Noncommercial educational AM and TV stations are not required to operate on a regular schedule and no minimum hours of operation are specified; but the hours of actual operation during a license period shall be taken into consideration in the renewal of noncommercial educational AM and TV broadcast licenses. Noncommercial educational FM stations are subject to the operating schedule requirements according to the provisions of Sec. 73.561.

those hours. When the need for emergency information dissemination may be most acute, there could be radio silence throughout much of the country. Given that many broadcast stations operate overnight unattended and at minimal expense, many will choose to go silent rather than take on the additional costs of staffing the station during hours when revenues are small or non-existent. Many will simply sign off.³⁸

There is no need for regulation here because there are procedures in place at many stations, including Saga stations, for alerting the public when an emergency happens during the hours when the stations are unattended.³⁹

This is 2008, not 1934, or even 1981 when radio was deregulated in part. Many technological innovations have made it not only possible, but desirable to operate stations by remote control. Most stations, including Saga's, have in place sophisticated equipment that allows the station to go on the air in an emergency even when unattended. For example, in the case of Saga's Jonesboro, Arkansas, stations, each one of Saga's full-time air personalities rotates being the "on call" announcer. During the week that an announcer is "on call", he or she is responsible for watching the news and especially the weather for breaking news and/or severe weather. The announcer is responsible for going into the station and getting the necessary information on the air. The announcer is instructed to call-in the necessary support staff to adequately cover whatever the situation is. In addition, Saga's Jonesboro general manager, who is also a morning personality on one of Saga's three stations, has a custom built remote pickup unit transmitter system

³⁸ Saga's Jonesboro, Arkansas, stations are unattended from 7PM to Midnight; and from Midnight to 5AM Monday through Friday and are also unattended on Saturday and Sunday, except during live remotes which happen midday on Saturday and occasionally on Sunday.

³⁹ See Attachment 9, Statement of Casper P. "Trey" Stafford, Vice President of Saga Communications of Arkansas, LLC, licensee of three FM stations in the Jonesboro, Arkansas, radio market.

installed in his home. The system allows him to be heard on one station, or all three stations simultaneously, to broadcast information if an emergency occurs and there is not time for an announcer to respond. The manager can control each station's automation computer using remote internet controller software. This system has, in fact, been used to broadcast severe weather coverage, news of an evacuation due to a hazardous gas leak, and school closing information due to inclement weather.⁴⁰

Saga has used its ability to operate unattended to its advantage from a technical standpoint. And Saga has certainly used the cost savings, not to just add to the bottom line, but to allow Saga to pay the market's top personalities in a way to keep them in the Jonesboro market. Saga utilizes them on multiple stations and during dayparts where top personalities are not normally heard. The residents of Jonesboro have certainly not been "hurt" in any way by unattended operation. Saga is driven by a strong competitive market to be on the air with important information, to be there first.⁴¹ Saga provides any public safety official that it can identify in a more than four county area the contact

⁴⁰ Saga's Jonesboro stations utilize Sine Systems remote control software at each transmitter site as well as a separate unit at the studio site. The unit can alert up to 7 different employee contact numbers during any off air event until an employee is contacted. In the event of loss of regular electric power, Saga has natural gas or diesel powered generators at all three transmitter sites as well as the studio site. Saga's plan for dealing with incidents during periods of unattended operation is discussed regularly during year in staff meetings. Prior to each severe weather season, Saga has a meeting where the staff members discuss all situations, including unattended coverage. This year's meeting included written handouts, powerpoint presentations, and similar methods of communication. Every staff member, including management, on-air, production, engineering, and sales, is involved in this training because, during an emergency, Saga realizes that any staff members can be involved in coverage, if not on-air, in the capacity of answering phones, calling in information from the field and similar tasks.

⁴¹ The Jonesboro staff, led by management, is the type of staff that will drop what it is doing and drive to the station with emergency lights flashing to make sure Saga gets the information on the air. It has happened repeatedly. Saga's Jonesboro stations' award-winning coverage of the Marmaduke, Arkansas, tornado on April 2, 2006, was done on a day of unattended operation where the staff reacted to a storm, staffed the station, got on the air, broadcast the information, and in the words of Marmaduke Mayor Nilean Drope, "Trey Stafford and Triple FM saved our town." In spite of near total community devastation, there was not one fatality on that day. This was amazing, in Saga's estimate. And on more than one instance, Saga's coverage was credited as the reason.

names and every possible number (home, cell, pager) that they will need to contact someone in the event some sort of information needs to get out during a time when its stations are unattended.⁴² Saga takes community service seriously. But, Saga does these things **VOLUNTARILY** and not because it is subject to strict requirements of the FCC. Saga believes this is fairly typical of small to medium market stations and proves that additional regulation is not necessary.

Renewal Application Processing Guidelines. As stated in paragraph 40 of the NPRM, the Commission tentatively concluded that it should reintroduce specific procedural guidelines for the processing of renewal applications for stations based on their localism programming performance, and sought comment on this proposal; however, there is no reason to return to those procedures. Local programming will not be enhanced and scarce station resources will be redirected to FCC compliance documentation.

Even though the Commission has burdened television licensees with its new “Enhanced Disclosure” Form 355, this obligation should not be imposed on radio broadcasters. Radio broadcasters present different types of programming than television stations making it more difficult to keep records of what is broadcast to the degree required by FCC Form 355. A television station can delegate a staff member to fill out Form 355 based on information supplied by networks, program syndicators and the licensee’s own local newsroom. Assembly of such data would be much more difficult for

⁴² Saga does this several times per year and has had no problems. Saga organized a meeting with its stations, KAIT-TV, and local emergency officials (OES Director, 911 Coordinator) recently over lunch to talk about ways to make sure Saga’s stations are staffed and equipped during an emergency regardless of the time of day.

radio licensees that tend to broadcast music in a certain format rather than blocks of programs such a television stations.⁴³

Main Studio Location. One of the most problematic proposals is to require that licensees locate their main studios within their local communities so that they are “part of the neighborhood.” This reveals a depth of misunderstanding of 21st century radio that is truly remarkable. While the Commission cites language from the septuagenarian Communications Act, the Commission seems oblivious to the changes facing radio broadcasters today that are vastly different from the environment as in 1934 when the Communications Act was new. Back in the day, there were usually no more than one or two stations in a community outside the largest population centers and there was no television. It made very logical sense to locate the main studio in the community of license since many programs consisted of live orchestras and drama programs. But this is 2008! The 1934-era requirement “that a broadcast station's main studio be accessible to its community of license” is not jeopardized by locating the main studio within the limits set forth in the current main studio location rule.⁴⁴ The Commission should **NOT** revert to the pre-1987 main studio rule for any reason. There is no evidence that it will encourage broadcasters to produce locally originated programming since there is no local

⁴³ The already overburdened FCC staff would have to be increased to process the mountains of electronic paper that would be filed. Activist groups with hidden agendas would be sure to record programming on target radio stations and compare the fruits of the recordings to whatever Form 355 morphs into. The slightest deviation in Form 355, sure to be backed up by a certificate of compliance, will result in (1) the activist group filing a petition to deny; (2) the licensee’s responsive pleadings addressed to that petition; (3) the need for a Commission staff member to analyze all the pleadings and prepare a draft decision; and (4) delay and uncertainty in the renewal process. In addition, the Commission should brace for the unavoidable process through the courts in the event of a decision adverse to the licensee. Undersigned counsel feels pangs of conflict since the FCC’s proposed rules, if adopted, could, on the one hand, do irreversible damage to his clients; yet, on the other hand, will usher in a boom of new projects for his firm and for the firms of other members of the Federal Communications Bar Association.

⁴⁴ See 47 C.F.R. §73.1125.

program origination rule. It was abolished in 1987 backed up by sound reasoning.⁴⁵ It will simply result in broadcasters staffing the main studios between the close of the business office and 10 p.m. when they sign off with a minimum wage “babysitter.” This is the reality of the current main studio rule that requires two persons to staff the main studio even though they have nothing to do while staffing it.⁴⁶ Few, if any members of the public, come to a radio station’s main studio.⁴⁷ Even then, the rules do not require any program origination. Members of the public show up at a main studio for what? To go on the air? Except for qualified political candidates, the licensee has no obligation to put anyone on the air.⁴⁸ Because there is no obligation to produce or originate even one nanosecond of programming from the main studio, location of the main studio in the community of license cannot be expected to increase interaction between the broadcast station and the community of service and there is no evidence to the contrary. It can only be expected to increase operating costs with no benefit.

The Commission is also not considering the real economic impact of reverting to the pre-1987 rule. As noted *supra*, Saga has several stations that serve the Portland,

⁴⁵ See, *Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, FCC Rcd 3215 (1987) (“Although compliance with the rule's formula may have served as a factor in determining whether the studio in the community was in fact the station's *main* studio, we believe this function of the rule is not essential. Moreover, the requirements may have imposed significant costs. The greatest cost may have been the loss of certain responsive programming. The rule's formula may have prevented stations from originating some programming from outside the community which would have made them exceed the 49% cap on outside programming. In addition, the inflexibility of the origination rule gave rise to frequent requests for waivers of the rule, resulting in administrative costs.”)

⁴⁶ *Jones Eastern of the Outer Banks, Inc.*, 10 FCC Rcd 3759 (1995).

⁴⁷ See Attachment 10, copy of email message to Manchester Cluster General Manager Ray Garon from Lisa Damon who states “In the last 6+ years I have had a total of 8 people come in and request to see the public file. 5 people were specifically looking for political activity during an election period, and the other 3 were from a local college doing a broadcasting project.”

⁴⁸ Title 47 USC § 326.

Maine, radio market, five of which are licensed to Portland, yet all operate from a main studio in South Portland, Maine, which is adjacent to Portland. Relocating the main studios of all of Saga's stations would be crippling and Saga's Portland stations would have to consider the value of operating 10 p.m.-6 p.m. when revenues for a station are at the bare minimum.⁴⁹ Financially, he says, it would make sense to sign off at 10 p.m. This is the opposite of the Commission's goal.

POLITICAL PROGRAMMING

The new disclosure requirements imposed on television licensees through the adoption of Form 355 should not apply to radio licensees for the reasons set out *supra* for record-keeping on other program elements.

UNDERSERVED AUDIENCES

As Saga has set forth in detail, *supra*, there is no need to mandate the establishment of community advisory boards to seek out underserved audiences. (Saga is puzzled about what an underserved audience even is or how one finds it.) Licensees are ascertaining issues and broadcasting responsive programming using the current system. Saga takes no position on the other proposals relative to the Commission's efforts to encourage ownership diversity.

⁴⁹ As set forth in the Statement of Cary Pahigian, Saga's Portland Vice President and General Manager, the estimated costs of relocating a main studio would involve: (1) Monthly rental fee of site \$4,000-\$6,000 per month, which in Saga's case would be \$48,000-\$72,000 per year; (2) Costs of one person to be on location at the main studio 24 hours per day, seven days a week, 365 days per year, at a minimum salary of \$15 per hour would be in excess of \$130,000 (3) The hard costs for relocating three studios could cost an additional \$600,000 per year; and (4) Other costs would include one-time costs to purchase new equipment for each studio which could potentially cost an additional \$300,000.

DISASTER WARNINGS

The NPRM promises action in a second docket on Emergency Alert Systems; and in the Digital Audio proceeding, states that the Commission is looking into whether it should require a physical presence at a broadcasting facility during all hours of operation. Saga, for the reasons set out above, has shown why this is not only unnecessary but will result in a lessening of service, and for the same reasons, Saga encourages this Commission to find that such a requirement should not be imposed on television licensees.

NETWORK AFFILIATION RULES

The questions posed by the Commission on affiliate station review of network programming are more a matter for comment from the networks since they will have the greatest burden. As a result, Saga takes no position on this aspect of the NPRM. With regard to the concerns raised about the use by stations of voice-tracking, Saga asserts that the Commission has no jurisdiction to limit the practice of voice-tracking, require disclosure, or otherwise address it. Voice-tracking has been shown to be an effective way to present higher-quality voice talent than could otherwise be justified in smaller markets. Employees can better use their time by sitting down in one session and recording voice-tracks which computerized automation systems insert in the programming than sitting in a control room listening to music waiting for the next break. Clearly, any such rules concerning voice-tracking would be outside the Commission's jurisdiction and could be violative of the First Amendment ban on restrictions on free speech and Section 326 of the Communications Act.

PAYOLA/SPONSORSHIP IDENTIFICATION

There are laws currently in force that are well understood that prohibit “payola” and require sponsorship identification. No additional rules are necessary. The First Amendment and the Communications Act give broadcasters rights to program their stations as they see fit in the public interest. Similarly, Saga sees no reason or statutory authority for the Commission to intrude further into program decisions by *requiring* licensees to provide data regarding their airing of the music and other performances of local artists and how they compile their stations’ playlists. This has been traditionally the role of music licensing organizations that track music play and collect royalties for their members. The Commission has enough on its plate without intruding into what is simply a private matter.

LICENSE RENEWAL PROCEDURES

The NPRM states the Commission’s tentative conclusion that it should reintroduce specific procedural guidelines for the processing of renewal applications for stations based on their localism programming performance. This proposed return to the previously abandoned methods of bean-counting is another very bad idea which, as set forth *supra* will only create more work for broadcasters and the FCC’s staff at renewal time but will not change local programming one *iota*. As Saga opposes any change to Commission’s manner of processing renewal applications, it has no comments on any of the specific questions posed by the Commission.

ADDITIONAL SPECTRUM ALLOCATIONS

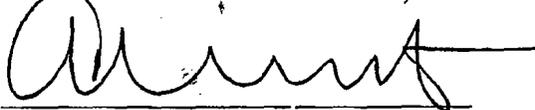
Upgrade of LPTV Stations to Class A Facilities. Finally, Saga has no objection to the Commission's proposal to convert qualifying LPTV stations to Class A stations. This could very well improve localism on the part of LPTV stations.

CONCLUSION

Notwithstanding the information before the Commission gathered at its localism hearings, Saga has shown herein that the reality is that most stations are achieving the Commission's goals of localism without the Draconian proposals in the NPRM. The commission needs to understand that the few operators who are not committed to their local communities will self destruct over the next few years. Market forces will render them useless in the face of new entertainment choices. The public does not need new laws. The market will kill off the bad operators leaving behind those stations who do effectively serve their local communities. Saga respectfully urges the Commission not to adopt the rules proposed.

Respectfully submitted,

SAGA COMMUNICATIONS, INC.



By: Gary S. Smithwick
Its Attorney

Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, NW
Suite 301
Washington, DC 20016
202-363-4560

April 28, 2008

ATTACHMENT 1

ATTACHMENT 1

STATEMENT OF STEVEN J. GOLDSTEIN

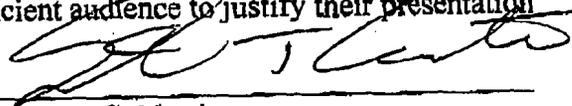
I am Executive Vice President of Saga Communications, Inc., and I am in charge of programming all Saga radio stations. I have 30 years of experience in radio programming. My curriculum vita is attached. It is my professional opinion that members of the radio audience listen to stations, generally, for one of three reasons: (1) to be entertained by their favorite personalities such as a morning comedy team; (2) to enjoy their favorite music, whether it be rock, classical, country or another of the ever-expanding music genres; and (3) to be informed by news, talk, sports and the like.

Listeners change stations constantly, leaving a station as soon as it presents something unappealing. Over time we have learned that listeners to music radio do not want their programs interrupted by talk, commercial announcements and news broadcasts so we carefully design this product to limit the intrusion. In almost all cases we run news updates in our most important time portion of morning "drive" time (when motorists are most likely to be listening). We also view community involvement as an integral part of our programming through local events and short form interviews. Most stations that present a music format broadcast their required long-form public affairs programs on weekend mornings in less popular time periods. They have learned that these programs are not congruent with the expectations of music listeners. Unfortunately, I fear that the only result of the FCC's localism proposed rules will be to cause listeners to tune out the unwanted talk of local affairs and defect to competing stations that are not, at that moment, broadcasting long-form public service programs.

As a company that operates more than 90 commercial radio stations in large, medium and small markets, and in order to remain at the top of those markets, Saga keeps its finger on the pulse of its communities. The radio business has evolved over time and stations have become much more narrow and specialized in their programming. This evolution has occurred because of the proliferation of competing radio voices, requiring stations to narrowly tailor their presentations in order to be competitive. For example, in the Milwaukee, Wisconsin, radio market, where Saga operates five commercial stations, there are 42 other stations, including noncommercial stations that compete with commercial stations for listeners. In the Columbus, Ohio, radio market, where Saga operates four commercial stations, there are 46 other stations. In addition to commercial stations broadcasting news and talk, listeners find news and public affairs programs on noncommercial stations carrying NPR and similar public interest programs. This multitude of choices, available to today's radio listener, did not exist when the Communications Act was enacted in 1934 or in 1971 when the formal ascertainment procedures were created. The broadcasting business is not only much more diverse but also very much more competitive. These facts support actions of the Commission that recognize that market forces – probably all on their own – ensure that broadcasters address the "localism" needs of the communities they serve.

Local programming is an important part of our program architecture, but long-form issue related shows tend not to draw sufficient audience to justify their presentation during certain periods.

April 28, 2008



Steven J. Goldstein
Executive Vice President
Saga Communications, Inc.

CURRICULUM VITA

Steven J. Goldstein

Executive Vice President and Group Program Director since 1988, has been employed by Saga since its inception in 1986. From 1985 until 1986, he was Vice President and Group Program Director of Josephson Communications. From 1981 until 1985, he served in the position of Program Director for Capital Cities/ABC Inc. at WHYT-FM in Detroit, for Metromedia Company at WOMC-FM in Detroit and for Chase Broadcasting at WTIC-FM in Hartford. From 1979 until 1981 Mr. Goldstein was in various positions including Regional Manager, Affiliate Relations with the NBC Radio Network, News Anchor at ABC Radio Network and Assistant Program Director of WABC-AM in New York City. Mr. Goldstein holds a BA in Communications Management from Ithaca College.

ATTACHMENT 2

ATTACHMENT 2

STATEMENT OF DAVID PAULUS

As manager of Saga's Norfolk stations, my experience is that most requests to view the public file occur during election periods. Occasionally a local candidate will come in to view the political file to see what the competitor is spending. Rarely, if ever, do members of the public visit the public file. I would like to add that Saga's Norfolk stations are heavily involved in local matters, that we broadcast material responsive to those matters, and that there is no reason to impose formal ascertainment reporting obligations on stations.

April 28, 2008



David Paulus
Vice President
Tidewater Communications, LLC
General Manager, WNOR, WAFX and WJOI

ATTACHMENT 3

Pakizyan

ATTACHMENT 3

STATEMENT OF CARY PAHIGIAN

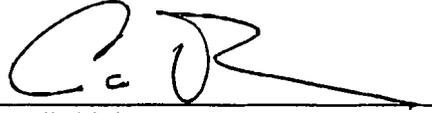
Saga's Portland stations regularly work with a variety of local organizations to address the needs of southern Maine. The stations broadcast a weekly community service program called *Maine Points*. This is a 30-minute program geared to address community issues in a long form-program. The program is broadcast on each of Saga's stations serving the Portland market. Moreover, WGAN(AM), a highly-rated radio station in the Portland market, which operates with a news-talk format, airs a regular local talk show Monday-Friday 5:30am-9am and Saturday/Sunday 6am-10am. Many of the issues discussed are local with opinions voiced by local callers. The issue-responsive program "fits" the WGAN news-talk format.

We promote fundraisers and raising awareness for civic organizations. In the past year these organizations have included: Preble Street Resource Center; Portland Public Library; Portland Chamber of Commerce; Maine Army National Guard; American Heart Association; American Red Cross; Make A Wish Foundation of Maine; Ronald McDonald House; Cancer Community Center; Maine Children's Cancer Program; Homeless Animal Rescue Team; Portland's Regional Opportunity Program; Camp Sunshine; Maine Credit Union League; Greater Portland Big Brothers Big Sisters; Maine Share; Maine Cancer Foundation; Cancer Connections Conference; City of Portland; and Portland Music Foundation

I do not believe the Commission is considering the real economic impact of reverting to the pre-1987 main studio location rule. Saga has several stations that serve the Portland, Maine, radio market, five of which are licensed to Portland, yet all operate from a main studio in South Portland, Maine, which is adjacent to Portland. The estimated costs of relocating a main studio would involve: (1) Monthly rental fee of site \$4,000-\$6,000 per month, which in Saga's case would be \$48,000-\$72,000 per year; (2) Costs of one person to be on location at the main studio 24 hours per day, seven days a week, 365 days per year, at a minimum salary of \$15 per hour would be in excess of \$130,000 (3) The hard costs for relocating three studios could cost an additional \$600,000 per year; and (4) Other costs would include one-time costs to purchase new equipment for each studio which could potentially cost an additional \$300,000.

Relocating the main studios of all of Saga's stations would be crippling and Saga's Portland stations would have to consider the value of operating 10 p.m.-6 p.m. when revenues for a station are at the bare minimum. Financially, it would make sense to sign off at 10 p.m.

April 28, 2008

A handwritten signature in black ink, appearing to read 'C. Pahigian', with a long horizontal line extending to the right from the end of the signature.

Cary Pahigian
Vice President
Saga Communications of New England, LLC
General Manager
WGAN, WZAN, WMGX
WPOR, WYNZ, WBAE, WVAE

ATTACHMENT 4



City of Manchester

Office of the Mayor
Hon. Frank C. Guinta

March 5, 2008

Ray Garon
President/General Manager
WZID-FM/WMLL-FM/WFEA-AM
500 Commercial St.; Fifth Floor
Manchester, NH 03101

Dear Ray,

I wanted to personally thank you for your efforts in making sure that WZID-FM, WMLL-FM, and WFEA-AM have been active partners in the community. Radio stations like yours – which give us free news, weather, traffic and emergency information to the public – provide a service that is increasingly rare in your industry, but no less important.

Beyond the basics, however, the people of your station have been actively involved in the community as a whole. Your station's commitment to being on the boards of both the Greater Manchester Chamber of Commerce and the Palace Theatre have helped the city's economic and cultural status, and your work with the American Red Cross and its Blood Services Division have been particularly important.

Being responsible corporate neighbors is vital to a city's growth, and I am happy to say that your stations certainly fulfill that role. I can count on you and the employees of WZID, WMLL, and WFEA to help make Manchester a better place, now and in the future.

Thank you,

Frank C. Guinta
Mayor of Manchester, N.H.



**Public Service
of New Hampshire**

The Northeast Utilities System

PSNH Energy Park
780 North Commercial Street
Manchester, NH 03101
www.psnh.com

March 27, 2008

Mr. Ray Garon, President
Manchester Radio Group
500 N. Commercial Street
Manchester, NH 03101

Dear Mr. Garon:

I just wanted to reiterate my thanks, and that of PSNH, for your continued efforts to ensure that staff members of the Manchester Radio Group (WZID, WFEA and WMLL) are readily accessible during times when Public Service of New Hampshire is working to communicate with the public.

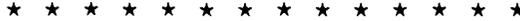
We are aware that many of our customers are your listeners, and it is vital to be able to pass along, through your radio stations, information of concern – especially during times of power restoration efforts.

We have always been able to reach you and your staff, day or night, and for that we are grateful. Thanks again for ensuring that this important line of communication remains open.

Sincerely,

Martin Murray, PSNH
Senior Corporate News Representative

EVENTSNH



Ray Garon
Manchester Radio Group
500 Commercial Street
Manchester, NH 03101

April 9, 2008

Dear Ray:

Thank you for supporting New Hampshire entrepreneurs through the 2008 Made In NH "Try It & Buy It" Expo! Manchester Radio Group's sponsorship helped make the event one of our best. With record attendance, fantastic media coverage and a sold out exhibit floor, Expo was a huge success this year. Attendance was up 3% on Friday, 27% on Sunday, and an amazing 38% on Saturday. More than 145 exhibitors were able to expand their business and market new products at Expo, thanks in part to your support.

We are delighted that you chose to participate in the Made in NH Expo this year. Thank you so much for working with EventsNH, *Business NH Magazine* and Millyard Communications.

Best regards,

Heidi Copeland
Vice President

Naomi Halter
Event Manager



American Heart Association® | **American Stroke Association®**

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April 4, 2008

To whom it may concern,

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Charles N. Pozner, M.D.
Nick Racanelli
Michael Schnieders
Ann L. Swan
William Tansey, III, M.D.
Hank Wasiak

I am writing this letter on behalf of 95.7 WZID, WFEA, and 96.5 The MILL for the amazing dedication and support it has given to the American Heart Association and the American Stroke Association's New Hampshire office of the Founder's Affiliate.

The American Heart Association and The American Stroke Association (AHA and ASA) have partnered with these top rated radio stations for the past ten years.

The Saga stations have all helped us to spread our message to the people in New Hampshire in an unprecedented way. They understood from the start that heart disease is the number one killer in New Hampshire and Stroke is the third leading killer. They opened their airways and their hearts in ways unmatched by other media. The stations give their listeners a sense of who we are, what we do and why it is important for them to become involved as volunteers, sponsors and/or donors. They help others understand our mission by providing a forum for our survivors and volunteers to tell their stories. They stress the importance of the research funded by the AHA and how it saves lives.

They also provide the information needed to their listeners that will help to build stronger healthier lives.

The Saga stations have offered: PSA's, on-air interviews, special contests with funds directed to AHA research, taped interviews, E-blasts, web coverage, invitations to promote the AHA at events, a monthly radio show (for 6 years now), dedicated funds to the AHA from the WZID Women's Expo (for the past three years), provided Emcees, prizes and auction items for all of our events, the list is extraordinary.

We are always treated as a member of the Saga family. The staff has always been compassionate, warm and caring. In a world of making a dollar and watching the bottom line, the stations have never hesitated to offer their services to the AHA for which we are eternally grateful.

The Saga stations are known in the non-profit world as a true community partner, a partner that cares very much about the people in NH.

With Heart,

Ellen B. McCooey
Director of Communications

Please remember the American Heart Association in your will.



Ray Garon

From: Susan Strickler [SStrickler@currier.org]
Sent: Tuesday, April 08, 2008 4:48 PM
To: Steve Jones (Steve Jones); Ray Garon
Subject: Thanks from the Currier

Dear Steve: Please extend my thanks to Ed Brouder and the team for broadcasting from the Currier and helping to showcase the museum, its programs, and collections. We've had over 23,000 people thru the museum in the 6 days the museum was open free to the public! We had about 3,000 people here on Sunday. The pace picked up in early afternoon, which points to the fact people were drawn by the broadcast! We appreciate VERY much your support over the years and your continued enthusiasm for the Currier. Thanks so very much.

Susan Strickler
Director
Currier Museum of Art
201 Myrtle Way
Manchester, NH 03104
www.currier.org
603 669-6144 ext 101



April 7, 2008

Mrs. Lucie Chakmakas
Manchester Radio Group
500 Commercial Street
Manchester, NH 03301

FEEDING THE PROGRAMS
THAT FEED THE HUNGRY

Dear Lucie,

I am very happy to write this letter of support for the Manchester Radio Group. Over the past few years, the Manchester Radio Group stations WZID and WMLL have been a tremendous help to the New Hampshire Food Bank in promoting events and giving free air time to food drives, fundraisers, and community activities.

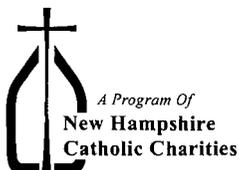
In 2007 the New Hampshire Food Bank, a program of New Hampshire Catholic Charities, distributed 4.5 million pounds of food to New Hampshire residents in need. In New Hampshire, nearly 100,000 people live at or below poverty; 28,000 of those are children. The New Hampshire Food Bank works to increase the availability and distribution of high-quality, nutritious foods to a network of nearly 350 food pantries, soup kitchens, children's programs, and elderly meal sites that feed the hungry.

One of our signature events, the Tons of Turkeys drive, was featured this year on the Manchester Radio Group stations. Their help was instrumental in making our thanksgiving food drive a success, and helped us to feed hundreds of families throughout New Hampshire.

The staff members at the Manchester Radio Group are committed to the programs and non-profits that benefit local communities in New Hampshire, and I am honored to have their continued support and advocacy.

Sincerely,

Melanie Gosselin
Executive Director



62 WEST BROOK STREET, MANCHESTER, NH 03101
(603) 669-9725 (603) 669-0270 FAX
WWW.NHFOODBANK.ORG





SOUP KITCHEN • FOOD PANTRY • SHELTER

April 2, 2008

Mr. Ray Garon
The Mill 96.5/WZID/WFEA
500 Commercial Street
Manchester, NH 03101

Dear Mr. Garon:

Thank you for your hard work and commitment to Tons of Turkeys this past Thanksgiving. Because of The Mill's leadership effort in this event we were able to give out 765 full Thanksgiving dinner boxes at our Food Pantry and an additional 324 turkeys to schools, churches and other service providers. We also had a Thanksgiving buffet at the Soup Kitchen and served 120 Thanksgiving dinners.

We are also very grateful for your participation in our Walk Against Hunger each year. The advertising on the air, e-mail blasts and The Mill's presence at the event enhances support and helps us to inform the public of the great needs for food relief assistance in our community.

It is also a great benefit to us that you are so open to posting our other events on your websites and reading PSA's on air. Your team has also been open and responsive to creating awareness when we have an urgent need for help.

We are very fortunate to have a strong relationship with your stations. You have helped us time and time again at our most significant times of need. Thank you again, for making a difference through your support of New Horizons. We are very grateful for all that you do throughout the year.

Sincerely,

Susan Howland
Development Director

McDonough School

550 Lowell Street
Manchester, N.H. 03104-5200

Kenneth DiBenedetto, Principal
Wendy J. Katsekas, Assistant Principal
David F. Keefe, Guidance Counselor

Telephone: [603] 624-6373
Fax Number: [603] 665-6692

November 26, 2007

Attn: Mary Silva
New Horizons for NH Inc.
199 Manchester Street
Manchester, NH 03103

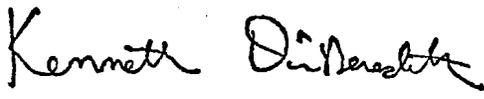
Dear Mary,

The faculty and staff at McDonough Elementary and the families of our school community would like to thank you and the staff at New Horizons for helping to make Thanksgiving so special for our families in need. We are truly overwhelmed by the thoughtfulness and kindness demonstrated by you and appreciate the commitment necessary to make an undertaking like this work so well. Please know that your efforts produced blessings for us all.

Sincerely,


Paula Alexander
School Social Worker


David Keefe
Guidance Counselor


Kenneth DiBenedetto
Principal

HENRY WILSON SCHOOL COMMUNITY CENTER

401 WILSON STREET
MANCHESTER, NH 03103
(603) 624-6350

New Horizons for New Hampshire
199 Manchester Street
Manchester, New Hampshire, 03101
Attention: Barbara—Food Pantry

Dear Barbara:

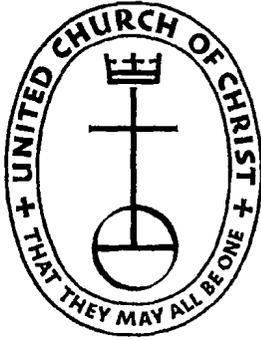
Thank you so much for helping our families out with Thanksgiving needs at the last minute. Everyone at your organization is so positive and helpful. The community is blessed to have an agency such as yours that truly supports those in need.

Again, we are grateful for your help and kindness.



Jane Pinard-School Social Worker
& The Henry Wilson School Community

Linda C. Durand, *Principal*
Ron Kew, *Assistant Principal*



BROOKSIDE CONGREGATIONAL CHURCH, UCC
2013 Elm Street, Manchester, NH 03104-2528
Telephone: (603) 669-2807 • Facsimile: (603) 668-9041
Web-site: www.brooksidecc.org

Carolyn H. Keilig, Interim Minister
pastor@brooksidecc.org

November 25, 2007

New Horizons for NH, Inc.
Susan Howland
199 Manchester Street
Manchester, NH 03105-0691

Dear Susan,

On behalf of the Outreach Committee and Brookside Congregational Church, I would like to extend our sincere gratitude for donating 70 turkeys for our annual Thanksgiving project.

This year we provided Thanksgiving meals to 72 families – a total of 307 people. Thank you for being a part of this effort.

Sincerely,

Denise Forest, Chair, Outreach

ATTACHMENT 5

Christine Forgey
Mayor

March 17, 2008

Mr. Dan Guin, General Manager
Saga Communications - WHAI
81 Woodard Road
Greenfield, MA 01301

Dear Mr. Guin,

I would like to take this opportunity to thank radio stations WHAI and WPVQ for their continued standard of contributing significantly to our community.

Like the residents of our community I know that I can count on these stations for accurate and fair coverage of government meetings from Town Council to School Committee and for the tough discussions on our severe budget shortfall to contract negotiations. Through my frequent WHAI radio broadcasts constituents can stay current in a timely manner with the key issues and new developments facing government. No other venue in our community offers the public an equal opportunity to hear the mayor apprise them on timely matters in an inter-active dialog. Residents also know they can count on WHAI's news staff for prompt weather-related cancellations and accurate updates in public safety situations.

Over the past year WHAI has taken a lead role in supporting the work of The Mayor's Task Force for a Domestic Violence-Free Greenfield. The station worked with the task force to develop and broadcast a series of public service announcements designed to educate and to heighten awareness surrounding domestic violence. The station also covered the community forum which was organized by the task force. WHAI is exemplary in fostering a work culture dedicated to enhancing our community through active involvement. One generous employee personally donated a significant sum to help promote a local performance with an anti-violence message. The depth of support from such a well-respected news and information source has helped to get the message out into the mainstream, to educate the public and to further legitimize the work of the task force.

Saga Communications is the pulse of Franklin County and the heartbeat of Greenfield. It keeps the Pioneer Valley informed. I would like to commend WHAI and WPVQ for excellence in serving Greenfield and all of Franklin County.

Sincerely,

Christine Forgey

Christine Forgey
Mayor

GREENFIELD



Baystate Franklin Medical Center

March 14, 2008

WHAJ/WPVQ Radio
81 Woodard Road
Greenfield, MA 01301

To the Leadership at WHAJ and WPVQ radio:

On behalf of the employees, medical staff and physicians at Baystate Franklin Medical Center, I want to thank you and your parent company, Saga Communications, for the outstanding job you do as the first line of communication to our community.

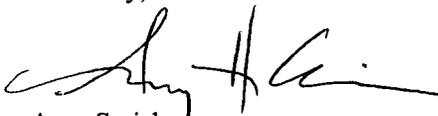
In the event of a disaster – from severe winter storms to summer heat waves, floods to fires – your station is the place where people in our community turn for up-to-the-minute information. Your staff checks the facts, delivers the news responsibly and professionally, and serves as the trusted voice we depend on.

Our hospital has used your station to get the word out when we've had to cancel programs due to slippery roads. And on one of the hottest days of summer, we used the station to let elders know they could come cool off at the hospital in a room we'd set aside for that purpose. On the other side of the equation, a couple of years ago when flood waters forced several people out of their homes, our food services manager heard on your station that help was needed at the high school, and he immediately pulled together sandwiches, drinks and other supplies. Your station is the truly great connector for all of us who live and work in Franklin County.

In addition to being there when disaster strikes, your station fills a vital role in promoting the events that contribute to our strong sense of community and shared purpose. From your presence at the American Cancer Society's annual Relay for Life event, to your coordination of food drives for the Western Massachusetts Food Bank, to your support of Baystate Franklin Medical Center's Spirit of Women Road Race, you give back to the community that tunes into your station – again and again and again!

Thank you for all you have done, and continue to do for the residents of our area. You are there when we need you, staffed by people who truly care about those on the other end of the air waves.

Sincerely,



Amy Swisher
Director of Public and Community Relations
Baystate Franklin Medical Center
164 High Street
Greenfield, MA 01301
413-773-2268



Greenfield Police Department

321 High Street
Greenfield Ma. 01301
Telephone: 413-773-5411
Fax: 413-774-6969



Chief David F. Guilbault

March 5, 2008

WHA1 WPVQ Radio
81 Woodard Rd
Greenfield Ma. 01301

To: WHA1, WPVQ Radio Station officials,

I want to take this time to thank your station and your parent company Saga Communications for the continued assistance you have provided the Greenfield Police Department disseminating important information to our local community.

Your station and staff have always provided a way for 24 hour instance assistance to us in times of natural disasters which include some severe winter storms, a devastating flood. The timely broadcast relying important information assisted our agency with evacuations and lessened the burden on field assets.

Many times you have also assisted us with missing person alerts getting the information to the public instantly.

In a recent double murder the station also provided facts to a nervous public that the offender was in custody and was not a continuing threat to public safety.

Lastly but of no less importance has been the civic assistance you have directly provided the police department in raising money for the local family homeless shelters. You employee Robert "Bobby Campbell" goes out of his way in making sure that Family's without resources are able to be sheltered and fed by helping our fundraising efforts.

I want to thank you for all you have done for the community.

Sincerely,

A handwritten signature in black ink that reads "D.F. Guilbault".

David F. Guilbault
Chief



Montague Police Department

1 Avenue A (413) 863-8911
Turners Falls, MA 01376 (413) 863-3210 (fax)

Chief Raymond J. Zukowski

3/10/2008

WHA1 WPVQ Radio
81 Woodard Road
Greenfield, MA 01301

To: WHA1, WPVQ Radio Station officials,

I want to acknowledge and thank your stations and parent company Saga Communications for the assistance you have provided my agency and our community with broadcasts that were timely and accurate, in potentially hazardous situations.

Snow emergencies, flooding, missing children or elders, traffic detours are just a few of the situations that we have relied on your stations to get out in a timely manor, twenty-four hours a day and seven days of the week.

Our community has greatly benefited with your willingness to broadcast "Public Service Announcements." These PSA's are invaluable in tough budget times where notification is necessary and essential. The stations' support the past two years during our public safety building project was instrumental, in my opinion, in gaining the support of the community where funding was approved for the building of a 5.65 million dollar police station.

I again thank Saga, WHA1, and WPVQ for their past and continued support.

Yours truly,

Raymond Zukowski
Chief of Police



Department of Public Works

Town of GREENFIELD, MASSACHUSETTS

Town Hall, 14 Court Square, Greenfield, MA 01301 Phone: 413-772-1528 Fax: 413-773-9593

March 6, 2008

Daniel Guin, Mgr
WHAI
81 Woodard Rd
Greenfield, MA 01301

Dear Mr. Guin,

The purpose of this letter is to express our appreciation for the wonderful cooperation we have received from your Station in regards to keeping our citizens informed of winter conditions, cancellations etc. As you are aware, this has been a very difficult winter with record levels of precipitation and particularly difficult storms. Being able to get storm related information to the public in a timely fashion is critical to the DPW's ability to properly clear and maintain the streets.

Again, thanks to you and your staff. WHAI's help allows us to more effectively do our job and protect the public safety.

Sincerely,

Sandra Shields
Sandra Shields
DPW Director

xc: Mayor Forgey

doc: SDS word/WHAI



Greenfield Fire Department

412 Main Street, Greenfield, Massachusetts 01301

Telephone: (413) 774-4322 Fax: (413) 772-1308

Website – <http://www.cityofgreenfield.org>



Mark H. Cogswell

Fire Chief

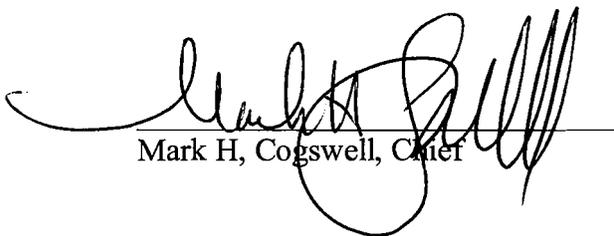
Mr. Daniel Guin
WHAI/WPVQ
81 Woodard Road
Greenfield, Massachusetts 01301

Dear Mr. Guin:

In my three years as Fire Chief for the City of Greenfield, WHAI and WPVQ have been valuable resources for the community. The radio stations have been utilized in notifying the citizens of this community during emergency situations. In my tenure as a Firefighter of over thirty years, this radio station has on many occasions assisted the Fire Department, again by way of notifying the citizens and visitors of Greenfield of ongoing hazardous incidents and emergency directions when needed. There has never been a problem in having WHAI and WPVQ respond whenever we have needed them; they get the information out in an impressive time frame.

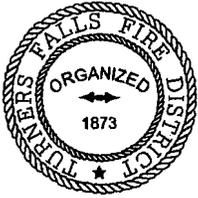
WHAI and WPVQ have always been involved in local matters, including, but not limited to, fire prevention activities, safety fairs, and other programs that are put forth by this Fire Department. They provide a vital link between the emergency services organizations and the community.

Sincerely,



Mark H, Cogswell, Chief

Public Safety Through Education, Courage, and Dedication



Turners Falls Fire Department
Fire, Rescue & Emergency Services

Fire Chief
Raymond A. Godin

180 Turnpike Road • Turners Falls, MA 01376-2602 • 413-863-9023

March 6, 2008

Mr. Dan Guin, General Manager
WHAI / WPVQ Radio
81 Woodard Rd.
Greenfield, MA 01301

Dear Mr. Guin,

Allow me to express my thanks and appreciation for the many times you and the WHAI/WPVQ team have assisted this department in our efforts at public outreach.

Throughout my 30 years with this department, WHAI, and later WPVQ, has always been available to assist us in notifying our residents of emergency situations such as fires, water main breaks, or flooding. Additionally, the radio stations have assisted us with Public Service Announcements covering fire prevention and safety education, as well as many of the civic activities our department have taken part in.

I hope that we will continue to be able to rely on you and your staff for these kinds of support, and that we can in some small way be able to help you as well.

Sincerely,

Chief Raymond A. Godin

International Association of Lions Clubs
Greenfield Lions Club
Greenfield, MA 01301

March 6, 2008

WHA1 Radio
WPVQ Radio
81 Woodard Road
Greenfield, MA 01301

Dear WHAI/WPVQ Officials:

The Greenfield Lions would like to Thank you for always being there to support our many Community Service and Fund raising Projects so we can continue to serve the City of Greenfield, and help eradicate blindness in our world today.

A Community Service organization like the Lions Club is not always as fortunate as we are to have a radio station like you who is willing to continually support us by allowing us to publicize our events throughout the day. Often we will offer tickets to our events as prizes for your listeners to win, but just as often you receive no compensation from us, for which we are grateful.

A prime example of your continued commitment to your community is the support the Greenfield Lions, Greenfield Kiwanis and Franklin County Rotary received from your stations for our Family Safety Day in June 2007. The media blitz you created throughout every day for three weeks prior to the event and for being on site at the Greenfield Swimming pool on the day of the event was priceless to us. You not only benefited the Kiwanis, Lions and Rotary, but the Greenfield Fire Department, Orange Forestry Service, Greenfield Police Department, Franklin County Sheriff's Office, Baystate Health Ambulance and the Greenfield Recreation Committee who were all involved in the event as well. Although the weather did not cooperate over 300 residents showed up to learn bicycle safety, how to get out of the locked trunk of a car, how to get out of a burning building, they saw K-9 demonstrations, and self defense demonstrations, and the Lions screened over 80 folks for visual and hearing impairments with their brand new EyeMobile.

We are forever grateful for what you do for the Lions and for your community. Again we would like to say THANK YOU for all you do. We look forward to many more productive years working with WHAI and WPVQ Radio.

Sincerely,



James Capen, President
436 Davis Street Ext.
Greenfield, MA 01301

Sincerely,



PDG Jean W. Martin, Secretary
172 Hope Street
Greenfield, MA 01301

ATTACHMENT 6



A Building on Faith Family and Community Mission
with a Focus on Seniors

"Combining Lessons from the Past with Visions for the Future"

FCC

March 12, 2008

Dear FCC Representative,

I would like to tell you about the blessing that WBCO/WQEL is to our community.

My name is Su S. Rowles and I have been involved in a variety of programs and organizations for the past forty plus years. Some of the better-known programs I've worked with are the Colonel William Crawford Fall Festival. This program grew from eighteen exhibitors to over 250 to become one of the largest Family Festivals in our State held on a School Campus. I founded the Habitat for Humanity Affiliate in Crawford County, most recently founded and am currently executive director of The NOAH Project one of the first non-profit Faith-Based community development corporations the has dedicated is efforts in the development of a totally accessible housing community for persons 55 years and older, including those with moderate physical challenges that is not under construction. I have also worked through the years with several Church and Youth programs.

I'm not telling you about all of these things to blow my own horn so to speak, but because if it wasn't for my friends at WBCO and WQEL these things could not have happened. Those involved with these stations have been part of the founding fabric that has not only helped me in my quest for better lives for the people of our area but that of many others.

When you call the station there is always a friendly voice that lifts your spirits and makes sure your needs are taken care of or that your are transferred to a professional that will help you.

P O Box 83 — Crestline OH 44827

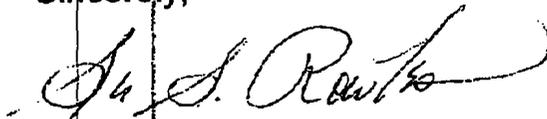
Phone (419) 683-3700 — E-mail noahproject@verizon.net

They have always been there when I need advice and or a helping hand.

These fine people and this station are the perfect example of what is needed in communities today. If we are going to make a difference in the lives of people and our country, we have to have reputable people reporting the news and supporting the communities they serve by reporting local news, events and activities. Our Churches, Schools, and Businesses also rely our station, as it's often their most reliable voice to the community.

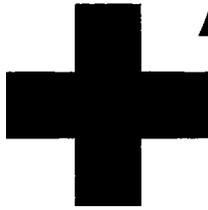
My hat is off to WBCO and WQEL there voice and ours for a better and more informed community.

Sincerely,

A handwritten signature in cursive script that reads "Su S. Rowles". The signature is written in black ink and is positioned above the printed name.

Su S. Rowles





American Red Cross



- A Partner in Fund Raising

Crawford County Chapter

110 E. Mary Street

Bucyrus, Ohio 44820

(419) 562-4357

FAX (419) 562-7983

E-mail: ccredcross@bright.net

March 5, 2008

To Whom this May Concern;

I would like to acknowledge the cooperation and support of the local radio stations WBCO and WQEL in the missions of the Crawford County Chapter of the American Red Cross.

Our mission is to educate the public in Health and Safety issues. To increase the level training of the local businesses, industry, government and health care professionals. The educational programs offered monthly, by our Red Cross Chapter have increased the quality of life of in our community, decrease suffering, injury and illness.

One of the best known functions of the Red Cross is the blood collection for medical use. It is a constant struggle to find new donors, so that the hospital shelves will never be empty when the need for blood arises. Our message is passed to our citizens by the efforts of WBCO and WQEL.

During the local flooding of August 21, 2007, our radio partners were so important in releasing the needed information to our flood victims and their families. So many were aided through the vital information on the airwaves during this devastating time.

WBCO and WQEL regularly covers our program topics by placing the programs in the Community Calender, local newscasts and by personal interviews on the talk radio morning program hosted by Debbi Gifford. The spotlighting of our activities has resulted in the much needed awareness of our local community. WBCO and WQEL practices important community leadership, through example, as participants!

Many Thanks for all of WBCO & WQEL's
support for our Crawford County Red Cross Chapter,

Joan M. Jones

Crawford County Chapter of the American Red Cross

Bucyrus Area Safety Council
110 East Mary Street
Bucyrus, Ohio 44820
419-562-4357

March 5, 2008

To Whom this May Concern;

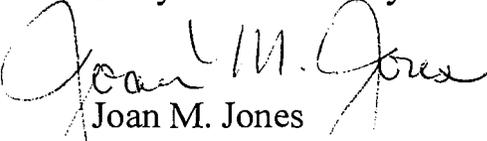
I would like to acknowledge the cooperation and support of the local radio stations WBCO and WQEL in the missions of our Bucyrus Area Safety Council.

Our mission is to increase the training and networking of the local businesses, industry, government and health care professionals. The educational programs offered monthly, by our Safety Council will decrease time lost to injury and illness due to working conditions and raise the quality of life for the employees and their families. \$120,000 of rebates to participant companies has been returned to our membership by active membership.

WBCO and WQEL regularly covers our program topics by placing the programs in the Community Calender, local newscasts and by personal interviews on the talk radio morning program hosted by Debbi Gifford. The spotlighting of our activities has resulted in the growth of our membership over the past five years of over 600 %. As well as being active members in our Safety Council, WBCO and WQEL practice important community leadership through example, as participants!

Our Safety Council appreciates the support and friendship of our local WBCO and WQEL. We hope to continue this positive relationship to improve our community for many years!

Many Thanks for all of WBCO & WQEL's
support for our Bucyrus Area Safety Council,


Joan M. Jones
Bucyrus Area Safety Council

Crawford County Commissioners

Commissioners

Gary Miller
Mo Ressallat
Carl W. Watt

112 E. Mansfield Street
Suite 304
Bucyrus, Ohio 44820



Telephone: 419-562-5876
Fax: 419-562-3491
www.crawford-co.org

Administrative Assistant

Julie L. Bell
Clerk
Barbara A. Leuthold

March 6, 2008

Federal Communications Commission

To Whom It May Concern:

The Crawford County Board of Commissioners would like to express our sincere gratefulness for our local radio station WBCO/WQEL. WBCO/WQEL has been and continues to be very active and supportive in our local communities.

The Crawford County Commissioners' have the opportunity each and every month to be a guest on WBCO to keep the residents informed about the local county government. In the event of emergency situations such as recent snow, ice and flooding situations WBCO/WQEL staff have been more than willing to do whatever necessary to meet the local needs.

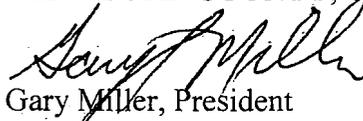
WBCO/WQEL is very active in the local school sporting events. They broadcast many of the games and are very visible at many of them sponsoring special events. They hold radio programs in various locations that provide local coaches and athletes an opportunity to share on the air.

Civically they are supportive of local clubs. They have been very useful in providing a means for local residents to gather information on candidates for elected positions. WBCO/WQEL is also a very welcomed presence at our week long county fair.

The Crawford County Commissioners are extremely proud to have such a locally minded and active radio station right here in our community. We feel that WBCO/WQEL is an excellent example of what a local radio station can and should be.

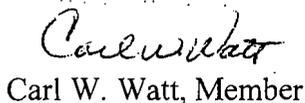
Sincerely,

BOARD OF COMMISSIONERS
CRAWFORD COUNTY, OHIO


Gary Miller, President

Mo Ressallat, Absent

Mo Ressallat, Vice President


Carl W. Watt, Member

WBCO Radio
Attn: Debbie Gifford
P.O. Box 1140
Bucyrus, Ohio 44820

Cathy George
Vice-President of Galion City Council
716 Maple Heights Drive
Galion, Ohio 44833

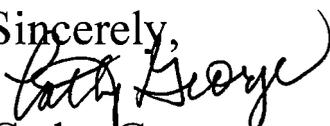
To whom it may concern:

I am writing this letter on behalf of WBCO to support the fact that they do promote community programming.

I approached the radio station last summer about doing a monthly program providing information about Galion City Council, and our city government in Galion.

Since last summer, WBCO has offered a 30-60 minute time slot each month for council members and employees of the City of Galion to provide information to the community.

I commend WBCO for their willingness to accommodate us, and provide a service to our city.

Sincerely,

Cathy George



Board of Education Administrative Center
470 Portland Way North
Galion, Ohio 44833
TEL: 419 468-3432
FAX: 419 468-4333
www.galion-city.k12.oh.us

TO: Federal Communications Commission

FROM: Kathleen S. Jenney, EdD 
Superintendent, Galion City Schools

SUBJECT: Local Support from WBCO/WQEL

DATE: March 10, 2008

As superintendent of the Galion City School District, I would like to express my high regard for the local media support we receive from WBCO/WQEL Radio Station in Bucyrus, Ohio. The Galion City School District is the largest district in the county and we rely heavily on media communication support from the Bucyrus area since we do not have a radio station in the city of Galion.

I believe WBCO/WQEL does an outstanding job of covering local news in Crawford County. For Galion, I am most pleased that we can rely on this local station to provide both AM and FM communications. The staff at WBCO/WQEL does an outstanding job of pursuing timely coverage of local events - everything from Board of Education meetings to sporting events and special activities in our schools. They are the local source of information on closings and delays and people in our community rely on this radio station for up-to-date information related to our schools.

I am especially grateful for the opportunity they provide to me monthly to be a guest on their WBCO radio station. This is a great opportunity for me to talk with the community about school issues and updates. This is the *only* radio station in the area that provides a local, live broadcast of this nature.

I would like to express my support for the efforts of the WBCO/WQEL staff who work hard to be a dependable source for local news. Their willingness to work closely with local schools and businesses provides the community with a much needed source of up-to-date information.



BUCYRUS
COMMUNITY HOSPITAL
For your health.

629 NORTH SANDUSKY AVENUE
BUCYRUS, OHIO 44820

March 6, 2008

RE: WBCO/WQEL

To Whom It May Concern:

This is a letter of support for WBCO/WQEL, the local radio station in Bucyrus, Ohio. The workers at WBCO/WQEL are always ready and willing to help Bucyrus Community Hospital (BCH) offer wellness programs to Crawford County residents. They have worked with us many times and have helped us provide incentives to women who have their mammograms done during October, Breast Cancer Awareness month. They were also the first sponsor of our annual "Affair of the Heart" program, which is a highly successful women's health retreat.

WBCO/WQEL has been instrumental in BCH's fundraising campaign; in addition to donating monies, they have very generously aired ads for us, helping us spread the word. Furthermore, WBCO/WQEL actively participates with other businesses and community members to provide programs and sponsor projects that benefit area residents. They do not just give money; they donate their time and energy to causes that inspire them.

Not only are the folks at WBCO/WQEL our fellow business leaders, they are our friends and neighbors as well. Their presence has certainly made a huge, positive impact on Bucyrus – we are very fortunate to have them located in our community.

Sincerely,

Gerard D. Klein
President/CEO

CMK

(419) 562-4677

A Proud Affiliate of the

Ohio State
HEALTH
NETWORK

WWW.BCHONLINE.ORG

**837 TIMBERLANE DRIVE
Galion, Ohio 44833**

March 10, 2008

WBCO/WQEL Radio
Attn: Debbie Gifford
P.O. Box 1140
Bucyrus, Ohio 44820

To whom it may concern:

I am happy to forward my comments with regards to the operation of radio station WBCO in Bucyrus, Ohio.

Since the summer of 2007 until the present the WBCO on air staff has hosted a program each month for 30 to 60 minutes permitting me or Ms. Cathy George to tell the public about our City and what was going on within our City Government.

That is the kind of public service that is wanting in many areas of the United States but not here. The program has been successful to the point that many of our residents were informed of government programs and other areas of local government operation.

One particular incident that they were helpful with was getting Emergency Management information for flood victims this past fall. Flooding had severally damaged several of the communities and WBCO assisted us in getting the proper information to those flood victims in order that they could file for the State and Federal assistance programs.

I am truly proud of WBCO and commend them for their public service during the past year and hope that they can continue in the future.

Sincerely,


Richard L. Swain, President
Galion, Ohio City Council



CITY OF GALION

301 Harding Way East • Galion, OH 44833-2087

Voice (419) 468-1857 • Fax (419) 468-7620

www.ci.galion.oh.us

March 11, 2008

WBCO-AM/WQEL-FM
403 E. Rensselaer St
P O Box 1140
Bucyrus, OH 44820

Dear Sirs/Ma'am:

We want to personally express our gratitude to your station for its outstanding community service during the past year. Our Council President, Vice President and several of the Department Heads have had the very pleasurable opportunity to appear on several of your morning shows to inform and discuss some of the many great things happening in and around the City of Galion. The avenue for spreading information and upcoming events you provide us is very valuable to everyone concerned, and we really appreciate your willingness and continuous invitation to do just that. Whether during the floods from last August, or just some discussion of things to come, the City of Galion can always count on WBCO to help us get the word out. And, we thank you!

Please pass our thanks to your employees who have always been most friendly and helpful. Also, feel free to pass this letter to affiliates, or anyone else you choose—we want to ensure folks know we appreciate all you do for our community. Have another great year, and thanks again for your assistance in keeping Galion, "Moving Forward!"

Sincerely,

David L. Oles
City Manager

Wynford Board of Education

Steve Mohr, Superintendent
Leesa Smith, Treasurer

3288 Holmes Center Road • Bucyrus, Ohio 44820
Phone (419) 562-7828

3/7/08

To Whom It May Concern,

I have been asked to write a letter of recommendation for WBCO-WQEL radio and it is with great pleasure that I do so.

I have been a resident of Crawford County for over thirty years and can emphatically state that this station is an important part of the daily life and culture of Crawford County, and that its' impact stretches far beyond the county boundaries. The station has adjusted its programming and services to fit the changing needs of the area and because of this vision, continues to be an integral part of the community when other local area stations have ceased to exist.

It is difficult to know where to begin to discuss the impact that the station has on this area. Its' athletic coverage and programs are the envy of radio stations across the state. From a civic standpoint, the station is involved in every community event with active advertising for groups and live broadcasts from the events. In the political arena, the citizens of Crawford County and surrounding area have benefited from the many candidates night events, interviews, and reporting of elections results. The local schools know that they have a solid supporter in WBCO-WQEL as they actively promote all school activities, report on school news, and are an integral source of communication to the public regarding school activities, especially in emergency and weather situations.

What is most impressive about the station is the fact that the employees are actively involved in the community as active members in community organizations such as Rotary, Kiwanis and the like. They are visible and active in attending the local fair and Bratwurst Festival, the two largest events in Crawford County.

As I mentioned earlier, I have resided in this area for over thirty years and know that one of the reasons it is a special place to live because of the positive impact and influence that this radio station has had.

Sincerely,



Steve Mohr, Superintendent
Wynford Local Schools

COMMUNITY
ORIENTED POLICING**BUCYRUS POLICE DEPARTMENT**

Kenneth L. Teets, Chief

500 S. Sandusky Avenue • Bucyrus, Ohio 44820
Phone: (419) 562-1006 • FAX: (419) 562-5341

03-06-08

Debra Gifford
403 E. Rensselaer St
Bucyrus, Ohio 44820

Ms Gifford,

I want to compliment your station and staff for their assistance in the City's recent flood crisis in September of 2007. This Department appreciated the timely distribution of information to the public. The information and reporting was very helpful to the public we both serve. I also want to take the opportunity to further acknowledge your support and assistance with other community functions. Among them, the National Night Out, Halloween Trick/Treat, Fraternal Order of Police, Relay for Life, and all the others that I have omitted. I know that the excellent relationship we share will continue. We wish continued success with your efforts. Again, thank you.

Sincerely,

A handwritten signature in cursive script that reads 'Kenneth L. Teets'.

Kenneth L. Teets
Chief of Police

ATTACHMENT 7

March 13, 2008

To Whom It May Concern,

My name is Bob Washel, Executive Director of the Buncombe County Schools Foundation. I am writing this letter in support of the tremendous job Asheville Radio Group has done to support our organization.

In the past few years, I have made numerous requests of the station to donate air time, prizes, or employee time for our fundraising events. And each time that I asked, I was met with a hardy, "no problem, whatever you need us to do, we are here for you." The best part is that the members at the station are true to their word – a value that isn't necessarily the norm in today's society. Employees have served as chairpersons for our events, donated time, money and prizes, aired our promos frequently for several programs without asking for anything in return. Multiply our Foundation's requests by a multitude of similar area organizations and one can see how active Asheville Radio Group is in our community.

In addition, I am fortunate to be serving on a unique board called Believe in Giving that is based at the station. This group is composed of members of the community and employees of the station who are interested in giving our youth an opportunity to turn dreams into reality. The board's success can be attributed to the incredible time and direction provided by the people who make up Asheville Radio Group. I have not participated on any committee that is as devoted to the task at hand or is as giving of their time and talents.

In closing, this ARG does it right. Their staff is dedicated to their jobs, involved in all aspects of the community, and our giving of their time and talents. To ask them to get mired in paperwork just to prove their involvement is unnecessary. It would be tragic to change the philosophy of a group that is functioning as successfully as it is. Instead of asking them to "put it in writing," why not visit them to see what others could and should emulate.

Thank you for time. If you would like to discuss these comments further, my contact information is listed below.

Regards,



Bob Washel, Executive Director
Buncombe County Schools Foundation
828-232-4190

March 13, 2008

Jim Lanning
President

Ingles Supermarkets
2913 US Hwy. 70 West
Black Mountain NC 28711

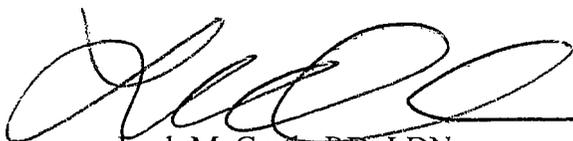
To Whom It May Concern:

It has been not only fun but rewarding to work with Ken and Tammy on the WOXL morning show for the past three years. Being a guest on the show has brought me a great deal of recognition and visibility in my role as the Ingles Dietitian.

Ken and Tammy are both consummate professionals who excel at putting their guests at ease and making the most out of every situation. At the same time, they are always quick to recognize my need to promote Ingles and enable me to do so gracefully.

I cannot tell you how many dozens of times I have had our customers approach me and tell me how much they enjoy hearing me on the Ken and Tammy morning show on WOXL. Sometimes customers are even able to recite verbatim what was said. Others say that they were surprised to learn some new bit of information about nutrition or a product that we sell at Ingles.

Having worked with numerous radio and TV hosts and anchorpersons, I will however tell you that Ken Ulmer and Tammy Jones are not typical. They do not "turn it off" when they leave the studio. Their commitment to the station, the community and their listeners is a 24 hour job that they obviously love. Like many of their guests, I have become their friend as well. They are priceless!



Leah McGrath, RD, LDN
Corporate Dietitian
Ingles Supermarkets
828-669-2941x470



March 19, 2008

To Whom It May Concern:

I am writing this letter to commend the Asheville Radio Group for the wonderful support they give to the community. Our agency is a nonprofit, community-based agency with programs funded by the United Way of Asheville and Buncombe County. We began advertising with ARG several years ago and have been impressed by the service, professionalism, the creative approach to public awareness and responsiveness.

Not only is ARG willing to respond to requests but they are proactive in collaborating with local service providers to help the community. A wonderful example of this was when ARG created a United Way PSA which featured a different United Way Agency program/service each month. The idea of the campaign was to help people in the community understand the diverse services that are funded through their contributions and to help people connect with services that they might need. ARG's support provided terrific commercials highlighting United Way and agencies; donors got the message and could enthusiastically support the annual United Way campaign and people in need learned of services that might assist them!

In addition, during the 2007 United Way campaign, ARG held a live-remote morning show to feature the United Way campaign and agency programs. It was a huge success, because ARG is a widely listened to station.

Annually we advertise with ARG and our ARG representative is constantly looking for ways for us to maximize our investment and get the most for our limited dollars. ARG has been creative and generous with providing free advertising to compliment our spots.

ARG is a community treasure, as are their staff members! From sales to producers to on-air personalities, the whole team cares about our community.

To hear that additional rules and added administrative burdens are even being considered is disheartening to me. What needs to happen is for incentives to be in place to reward stations like ARG and make it easier for them to invest in the community, not more time consuming and expensive.

Feel free to contact me if you need additional information. Again, we appreciate ARG's commitment to our work and the people of western North Carolina.

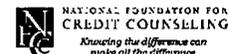
Sincerely,

A handwritten signature in cursive script that reads 'Celeste B. Collins'.

Celeste B. Collins
Executive Director

telephone 828 255 5166
toll free 800 737 5485
web www.ontrackwnc.org

50 S. French Broad Avenue Suite 227 Asheville NC 28801





March 10, 2008

To Whom It May Concern:

My name is Sally Crutchfield and I work as the Special Events Director for CarePartners Foundation, a non-profit organization in Asheville, NC. For the past five years I've had the privilege to include Asheville Radio Group's WOXL and WISE as a community partner in numerous fundraising and community outreach endeavors for our organization. Some of the projects have included our annual holiday Festival of Trees; grand opening and sales events at Hospice Treasures (our thrift store); our Mustangs for Hospice Pony Run; CarePartners Health Fairs; and our Celebrity Dinner.

It's been my experience that any of the representatives of these stations are always willing to go beyond normal job expectations and help in any way possible. We've been the grateful recipients of donated advertising and donated radio staff time on many occasions. I'm confident to state that if it weren't for the support of these stations, our fundraising events would carry much less impact and achieve disappointing results.

In addition, as a member of this community and a regular listener of WOXL, I can assure you the efforts of Asheville Radio Group to participate in a wide range of events throughout Buncombe county and our surrounding area are constant. I'd have a difficult time trying to list all of the community efforts supported by these radio stations!

I will certainly continue to utilize the assistance of the professional representatives of Asheville Radio Group in any fundraising or other community activities that arise in my work role and beyond. If you need additional information you may contact me at (828) 779-9790.

Sincerely,

A handwritten signature in black ink that reads "Sally D. Crutchfield". The signature is written in a cursive style with a large initial 'S'.

Sally D. Crutchfield
Special Events Director
CarePartners Foundation



March 4, 2008

Randy Cable
General Manager
Classic Hits 96.5
1190 Patton Ave.
Asheville, NC 28806

Dear Mr. Cable,

Asheville Humane Society is grateful for our longstanding relationship with Classic Hits 96.5 and the Asheville Radio Group. Your generous, consistent support over many years has allowed us to better care for the nearly 8,000 animals that still come to us for help each year. Animal cruelty and overpopulation are community problems, requiring a community solution, and the generosity of community partners like you allows us to reach a wide audience with important messages about caring for animals. The lives of animals in Western North Carolina are touched by the generous spirit of Asheville Radio Group.

It does take a village to care for the least among us, and we are grateful that you take a leadership role in this village.

On behalf of the animals served by Asheville Humane Society, we thank you, and we look forward to continuing to grow this positive, productive partnership with your organization.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carolyn', is positioned below the word 'Sincerely,'.

Carolyn Paden
Director of Public Relations

March 12, 2008

Randy Cable
VP/General Manager
Saga Communications
1190 Patton Avenue
Asheville, NC 28806

Dear Randy,

This letter is in reference to the outstanding community service your stations provide to the greater Asheville, NC area.

My company, MarketImpact, Inc. has been personally involved with Saga Communications on the following community programs: Believe in Giving, Lighten Up 4 Life Business Weight Loss Competition and Avery's Corner. With each and every initiative your organization has whole-heartedly supported the needs of these organizations through on-air time, personnel, and funds.

Because of Saga's dedication to our community there is a beautiful children's park devoted to the memory of Avery King, a children's organization (Believe in Giving) offering children a way to make their community projects come to life and a business weight loss competition (Lighten Up 4 Life) that has reached over 200 businesses and 3,000 participants competing to get healthy.

Thank you and Saga Communications for your dedication to our community!



Maureen Scullin
Managing Partner
MarketImpact, Inc.

MARKET IMPACT
ADVERTISING & PROMOTION

204 Weston Way Asheville, NC 28803 828-681-5534

ATTACHMENT 8



June 19, 2006

Dear Bill Wells,

Thank you for agreeing to air ABATE of Iowa's radio PSAs. Your contribution is helping to make Iowa's roadways safer for all travelers.

ABATE believes that education is the key to improving safety and reducing accidents. Motorists often don't think to look for motorcycles on the road – the most common type of collision occurs when a driver enters an intersection directly in front of a motorcyclist. Thank you for doing your part to raise awareness and deliver an important safety message during peak motorcycle riding season.

Thanks for your cooperation and concern for the safety of Iowa travelers! ABATE of Iowa is always available to you as a resource for motorcycle safety information.

Sincerely,

Steve Rector
ABATE of Iowa State Coordinator

altoona campus

strengthening body, mind, community

May 18, 2007

www.altoonacampus.com

Mr. Jeff Delvaux
Des Moines Radio Group
1416 Locust Street
Des Moines, IA 50309

Dear Jeff

Altoona Campus would like to express our most sincere appreciation for your donation of advertising time to support the Robert and Sharon Townsend Endowment for Youth Programming. The second annual Altoona Family Fun Run met its goal of raising over \$15,000 for the fund, and more than 120 participants enjoyed the beautiful weather we had for the race!

We honestly could not have done this without you. Thank you for your generosity and support. See you on the trails!

Warmest regards,



Bruce Mason, Executive Director
ALTOONA CAMPUS

*Jeff,
Thanks so much for
your support.
Bruce*

altoona campus

strengthening body, mind, community

May 8, 2006

www.altoonacampus.com

Mr. Jeff Delvaux
Des Moines Radio Group
1416 Locust Street
Des Moines, IA 50309

Dear Jeff,

This letter is to express our most sincere appreciation for your donation of radio ads to support the Robert and Sharon Townsend Endowment for Youth Programming. The inaugural Altoona Family Fun Run met its goal of raising over \$10,000 for the fund and participants enjoyed the beautiful weather we had for the race!

We honestly could not have done this without you. Thank you for your generosity and support. See you on the trails!

Warmest regards,



Bruce Mason, Executive Director
ALTOONA CAMPUS



Dear Bill,

4/23/08

Congratulations on winning a Crystal Radio award! Star 102.5 is truly a community leader. We appreciate all you + your staff does to help patients + families at UI children's Hospital.

Looking forward to a successful Radiothon! Congratulations! Sincerely,
Michelle Autmaier



E-801

Bill,

Thank you for the opportunity to visit your radio stations last week. I appreciate the chance to share with your listeners what MDA is doing in the community for families with neuromuscular disease. Thanks for caring! ☺

Denise Kirkade



4525 South 2300 East

Salt Lake City, Utah 84117

Tel: 801.278.8900

Fax: 801.277.8787

www.childrensmiraclenetwork.org

April 1, 2008

Bill Wells
General Manager
KSTZ-FM
1416 Locust St
Des Moines, IA 50309

Dear Bill:

In 2007, you and your station played a vital role in helping to raise more than \$52 million for Children's Miracle Network hospitals. What that means for kids in your community is access to the finest healthcare when they need it—right in their own backyard. On behalf of the children we serve, thank you for the investment you've made in their health and wellness.

A version of this framed art appeared in the December 21 issue of Radio & Records, in recognition of your efforts, and the efforts of the more than 340 radio stations now conducting Children's Miracle Network Radiothons. We hope you will display this piece with pride in your position as a community leader committed to local kids.

With warm regards, *Radiothon Team*

The Children's Miracle Network Radiothon Team

Bob Lind
Karen Profita
Joe Trevino
Steve Reynolds

Everett Marshall
Jim Littrell
Anthony Candito
Jeff Johnson

Perry Esler
Bill Barr
Katie Schrier



STATE OF IOWA

CHESTER J. CULVER
GOVERNOR
PATTY JUDGE
LT. GOVERNOR

DEPARTMENT OF ELDER AFFAIRS
JOHN MCCALLEY, DIRECTOR

April 25, 2008

MEMORANDUM

TO: All Interested Parties

FROM: Director John McCalley, Iowa Department of Elder Affairs

RE: *Des Moines Radio Group's* community awareness for older adults and their families.

The *Des Moines Radio Group* has provided valuable services to the Iowa Department of Elder Affairs during the calendar year of 2007 and through the first two quarters of 2008. During that time, the *Radio Group* has donated talent, airtime, and production services to the Department.

The Iowa Department of Elder Affairs is Iowa's official State Unit on Aging, as established by the federal Older Americans Act and the state Elder Iowan Act. A core aspect of the Department's mission is to raise awareness and educate the public about programs that help older adults remain healthy and independent as they age. Mr. Pete Rose and his colleagues at the *Des Moines Radio Group* have helped the Department take meaningful steps in service to that mission.

The work of the *Des Moines Radio Group* encouraged listeners to attend the 2007 Governor's Conference on Aging, promote the upcoming 2008 Governor's Conference on Aging, and help build general awareness about services that support older adults and their families. This work is particularly valuable since the Department is equipped with very limited means to reach large audiences on its own.

The Iowa Department of Elder Affairs appreciates the *Des Moines Radio Group's* ongoing efforts to contribute positively to the fabric of the central Iowa community.



Founded in 1994

August 28, 2007

Des Moines Radio Group
Ms. Peggy Ward
1416 Locust Street
Des Moines, IA 50309

Dear Ms. Ward:

Glen Oaks Country Club and the 2007 Women's Charity Gala Committee would like to thank you for your support in making this 3rd annual event such an outstanding success. Our goal last year was to improve this charity event and it is through your continued community support that we were able to accomplish this.

We are excited to share with you that the 2007 donations to the Polk County Chapter of the American Heart Association were increased considerably through, expanded media coverage from radio station 104.1, The Des Moines Register, KCCI Channel 8 and DM Women's Magazine. The event was also expanded by including a Gala Dinner and Charity Auction on Friday evening. Your support is what helped bring this event to the next level. We are pleased to announce that through our combined efforts we were able to raise \$34,000; a \$10,000 increase over last year's contributions.

One of the main goals of Glen Oaks Country Club is to be an active community member while providing events that add to the quality of life in Polk County. Through the annual Women's Charity Gala Classic we are making strides in achieving that goal. Glen Oaks Country Club and the American Heart Association, Polk County Chapter, would like to express our deepest appreciation for the support you provided in this event.

The committee is already working on choosing a charity focusing on women's health for the 2008 Women's Charity Gala. We will again feature the Gala Dinner and Auction on Friday evening, August 1, 2008 and the Women's Golf Charity Classic on August 2, 2008. We hope we can count on your continued support.

It is very gratifying knowing that we are making a difference in health care for women in Polk County.

Sincerely,

Mary Finn
Chair, Glen Oaks Board of Directors

Kathie Yancey
Glen Oaks Women's Charity Committee

1401 Glen Oaks Drive • West Des Moines, Iowa 50265-6630 • www.glenoakscc.com

Clubhouse 515-221-9000 • Fax 515-221-9100 • Golf Pro Shop 515-221-9500 • Fax 515-221-7433 • Grounds 515-223-2806

Kiwanis

www.kiwanis.org

Kiwanis Club of Des Moines (Downtown)

505 5th Ave Ste 302

Des Moines IA 50309-2333

Phone: 515-282-9045 Fax: 515-243-2700

Email: info@downtowndesmoineskiwanis.org

www.downtowndesmoineskiwanis.org

March 14, 2008

Mr. William V. Wells
Vice President & General Manager
Des Moines Radio Group
1416 Locust Street
Des Moines, IA 50309

Dear Bill:

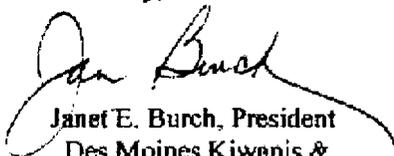
It's hard to find the words that adequately express our sincere thank you for all that your organization has done to further our Kiwanis mission of "Serving the Children of the World".

Des Moines Kiwanis is truly blessed to have the Des Moines Radio Group as our partner in our efforts to make the lives of children better in central Iowa. Your unselfish partnership produced the best-ever publicity for our 2007 Basketball Jamboree. Your efforts resulted in our presenting Ronald McDonald Charities with a check for over \$15,000, which will be returned nearly doubled to us for the **Kiwanis Miracle League at Principal Park**.

We look forward to even greater results through your latest effort (production, copy writing, and air time) in publicizing our Miracle League throughout the community with the Ted McClelland 60-second spot. It's wonderful to have a partner who believes as we do—that every child deserves a chance to play baseball. Together, we will make that happen for the kids in central Iowa this summer.

Thanks for all you do!

Sincerely,



Janet E. Burch, President
Des Moines Kiwanis &
Vice President,
Kiwanis Miracle League at Principal Park

*Kiwanis is a global organization of volunteers dedicated to changing the world
one child and one community at a time.*



United Way
of Central Iowa

January 19, 2007

Mr. William Wells
Des Moines Radio Group
1416 Locust St.
Des Moines, IA 50309

Dear Bill,

I would like to take a moment to thank you for Des Moines Radio Group's involvement in the United Way campaign this year. Your involvement helped us exceed our goal and raise \$22,221,906. Thanks!

Employees of Des Moines Radio Group contributed a total of \$5,020 which was nearly a 20% increase. The time and energy you put forth, as well your visible leadership, were key reasons for the success of the campaign.

The mission of United Way is to improve lives by uniting the caring power of our community. Thanks to your generosity, more young children are ready for school, youth will graduate from school, families will achieve economic success, and people in need can receive basic services.

The vitality of the community lies in the success of our businesses, strength of our institutions, and in the hearts of our citizens. Your company's employees truly make a difference.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leslie".

Leslie Mestdagh
Campaign Associate
United Way of Central Iowa

*Bill -
Thank you for
your continued
leadership and support.
Best Regards,
Leslie*

what matters.™



ATTACHMENT 9

ATTACHMENT 9

STATEMENT OF CASPER P. STAFFORD III

There is no need for additional regulation because there are procedures in place at many stations, including Saga's Jonesboro, Arkansas, stations, for alerting the public when an emergency happens during the hours when the stations are unattended.

In the case of our cluster, each one of Saga's full-time air personalities rotates being the "on call" announcer. During the week that an announcer is "on call", he or she is responsible for watching the news and especially the weather for breaking news and/or severe weather. The announcer is responsible for going into the station and getting the necessary information on the air. The announcer is instructed to call-in the necessary support staff to adequately cover whatever the situation is. In addition, the undersigned, who is also a morning personality on one of Saga's three stations, has a custom built remote pickup unit transmitter system installed in my home. The system allows me to be heard on one station, or all three stations simultaneously, to broadcast information if an emergency occurs and there is not time for an announcer to respond. I can control each station's automation computer using remote internet controller software. This system has, in fact, been used to broadcast severe weather coverage, news of an evacuation due to a hazardous gas leak, and school closing information due to inclement weather.

We utilize Sine Systems remote control software at each transmitter site as well as a separate unit at the studio site. The unit can alert up to 7 different employee contact numbers during any off air event until an employee is contacted. In the event of loss of regular electric power, Saga has natural gas or diesel powered generators at all three transmitter sites as well as the studio site. Saga's plan for dealing with incidents during periods of unattended operation is discussed regularly during year in staff meetings. Prior to each severe weather season, Saga has a meeting where the staff members discuss all situations, including unattended coverage. This year's meeting included written handouts, powerpoint presentations, and similar methods of communication. Every staff member, including management, on-air, production, engineering, and sales, is involved in this training because, during an emergency, Saga realizes that any staff members can be involved in coverage, if not on-air, in the capacity of answering phones, calling in information from the field and similar tasks.

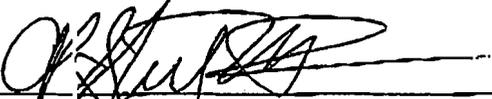
Saga has used its ability to operate unattended to its advantage from a technical standpoint. And Saga has certainly used the cost savings, not to just add to the bottom line, but to allow Saga to pay the market's top personalities in a way to keep them in the Jonesboro market. Saga utilizes them on multiple stations and during dayparts where top personalities are not normally heard. The residents of Jonesboro have certainly not been "hurt" in any way by unattended operation. Saga is driven by a strong competitive market to be on the air with important information, to be there first. Saga provides any public safety official that we can identify in a more than four county area the contact names and every possible number (home, cell, pager) that they will need to contact

someone in the event some sort of information needs to get out during a time when its stations are unattended

The Jonesboro staff, led by management, is the type of staff that will drop what it is doing and drive to the station with emergency lights flashing to make sure Saga gets the information on the air. It has happened repeatedly. Saga's Jonesboro stations' award-winning coverage of the Marmaduke, Arkansas, tornado on April 2, 2006, was done on a day of unattended operation where the staff reacted to a storm, staffed the station, got on the air, broadcast the information, and in the words of Marmaduke Mayor Nilean Drope, "Trey Stafford and Triple FM saved our town." In spite of near total community devastation, there was not one fatality on that day. This was amazing, in my estimate. And on more than one instance, our coverage was credited as the reason.

Saga does this several times per year and has had no problems. Saga organized a meeting with its stations, KAIT-TV, and local emergency officials (OES Director, 911 Coordinator) recently over lunch to talk about ways to make sure Saga's stations are staffed and equipped during an emergency regardless of the time of day.

April 28, 2008



Casper P. (Trey) Stafford III
Vice President
Saga Communications of Arkansas, LLC
General Manager
KEGI, KDXY and KJBX

ATTACHMENT 10

Ray Garon

From: Lisa Damon [lisawzid@aol.com]
Sent: Monday, March 31, 2008 9:52 AM
To: Ray Garon
Subject: Public File

Ray,

In the last 6+ years I have had a total of 8 people come in and request to see the public file. 5 people were specifically looking for political activity during an election period, and the other 3 were from a local college doing a broadcasting project.

If you need any further information, please let me know.

Lisa